

**SAN JOAQUIN VALLEY  
AIR POLLUTION CONTROL DISTRICT**  
Texaco California Inc.  
**FINAL ENGINEERING EVALUATION  
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**ATTACHMENT A - DETAILED FACILITY PRINTOUT**

**ATTACHMENT B - INSIGNIFICANT ACTIVITIES OR EQUIPMENT**

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## **TITLE V APPLICATION REVIEW**

Project #: 970018  
Deemed Complete: 6/2/97

Engineer: Juscelino Siongco  
Date: December 7, 2001

Facility Number: S-1141  
Facility Name: Texaco California Inc.  
Mailing Address: Box 5197  
Bakersfield, CA 93388

Contact Name: Roy Campbell  
Phone: (661) 768-3465

Responsible Official: Steve Hadden  
Title: Vice President of California Business Unit

### **I. PROPOSAL**

Texaco California Inc. is proposing that an initial Title V permit be issued for its Heavy Oil Western facility in Kern County. The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with those applicable requirements, and to provide the legal and factual basis for proposed permit conditions.

### **II. FACILITY LOCATION**

Texaco California Inc. is located at Heavy Oil Western, CA.

### **III. EQUIPMENT LISTING**

A detailed facility printout listing all permitted equipment at the facility is shown in Attachment A.

A summary of the exempt equipment categories which describe the insignificant activities or equipment at the facility not requiring a permit is shown in Attachment B. This equipment is not exempt from facility-wide requirements.

### **IV. GENERAL PERMIT TEMPLATE USAGE**

The applicant is requesting to use the following model general permit Templates:

A. SJV-UM-0-1, Facility Wide Umbrella General Permit Template

The applicant has requested to utilize template SJV-UM-0-1, Facility Wide Umbrella, for this facility. Based on the information submitted in the Template Qualification Form, the applicant qualifies for the use of this template.

B. SJV-BSG-13-0, Boilers, Steam Generators and Process Heaters

The applicant has requested to utilize template SJV-BSG-13-0, Boilers, Steam Generators and Process Heaters for the Steam Generators S-1141-19-13, -26-9, -27-13, -31-11, -32-9, -33-13, -34-12, -35-14, -38-11, -39-10, -43-9, -44-12, -45-12, -46-12, -47-12, -48-12, -49-12, -50-12, -51-12, -52-12, -53-13, -55-12, -60-12, -61-12, -67-16, -70-11, -518-1, -519-1, -520-1, -521-1, -522-1, -523-2, -525-1, -526-1, -527-3, -528-3, -530-1, -531-1, -532-1, -533-1, -534-1. Based on the information submitted in the Template Qualification Form, the applicant qualifies for the use of this template.

C. SJV-BSG-17-0, Boilers, Steam Generators and Process Heaters

The applicant has requested to utilize template SJV-BSG-17-0, Boilers, Steam Generators and Process Heaters for the Natural Gas Fired Heater Treater S-1141-73-3, -232-3, -233-2, -234-3, -235-2, -236-2, -238-2, -239-2, -240-3, -241-3, -242-4, -243-4, -244-3, -245-3, -246-3, -258-3, -259-3, -322-2, -323-2. Based on the information submitted in the Template Qualification Form, the applicant qualifies for the use of this template.

D. SJV-BSG-19-0, Boilers, Steam Generators and Process Heaters

The applicant has requested to utilize template SJV-BSG-19-0, Boilers, Steam Generators and Process Heaters for the Steam Generators S-1141-369-3, and S-1141-370-3. Based on the information submitted in the Template Qualification Form, the applicant qualifies for the use of this template.

F. The applicant has requested to utilize template SJV-IC-1-0, Series 1 Internal Combustion Engine for the 166 BHP Cummins Diesel Engine S-1141-352-2, S-1141-353-2, S-1141-354-2, and S-1141-355-2. Based on the information submitted in the Template Qualification Form, the applicant qualifies for the use of this template.

G. SJV-WV-1-1, Series 1 Well Vents

The applicant has requested to utilize template SJV-WV-1-1, Series 1 Well Vents for the Thermally Enhanced Oil Recovery (TEOR) S-1141-250-8, -251-7, -253-9, -263-8, -320-4, -331-9, -365-3, -366-3, and -367-3. Based on the information submitted in the Template Qualification Form, the applicant qualifies for the use of this template.

**V. SCOPE OF EPA AND PUBLIC REVIEW**

Certain segments of the proposed Operating Permit are based on model general permit templates that have been previously subject to EPA and public review. The terms and conditions from the model general permit templates are included in the proposed permit and are not subject to further EPA and public review.

For permit applications utilizing model general permit templates, public and agency comments on the District's proposed actions are limited to the applicant's eligibility for model general permit template, applicable requirements not covered by the model general permit template, and the applicable procedural requirements for issuance of Title V Operating Permits.

The following permit conditions, including their underlying applicable requirements, originate from model general permit templates and are not subject to further EPA and Public review:

Conditions 1-39 of the requirements for permit unit S-1141-0-1.

Conditions 1-16 of the requirements for permit unit S-1141-19-13, -26-9, -27-13, -31-11, -32-9, -33-13, -34-12, -35-14, -38-11, -39-10, -43-9, -44-12, -45-12, -46-12, -47-12, -48-12, -49-12, -50-12, -51-12, -52-12, -53-13, -55-12, -60-12, -61-12, -67-16, -70-11, -518-1, -519-1, -520-1, -521-1, -522-1, -523-2, -525-1, -526-1, -527-3, -528-3, -530-1, -531-1, -532-1, -533-1, -534-1.

Conditions 1-14 of the requirements for permit unit S-1141-73-3, -232-3, -233-2, -234-3, -235-2, -236-2, -238-2, -239-2, -240-3, -241-3, -242-4, -243-4, -244-3, -245-3, -246-3, -258-3, -259-3, -322-2, -323-2.

Conditions 1-14 of the requirements for permit unit S-1141-369-3, and S-1141-370-3.

Conditions 1-11 of the requirements for permit unit S-1141-352-2, S-1141-353-2, S-1141-354-2, and S-1141-355-2.

Conditions 1-19 of the requirements for permit unit S-1141-250-8, -251-7, -253-9, -263-8, -320-4, -331-9, -365-3, -366-3, and -367-3.

## **VI. APPLICABLE REQUIREMENTS ADDRESSED BY GENERAL PERMIT TEMPLATES**

Kern County Rule 407<sup>1 2 3 4</sup>

Kern County Rule 407.2<sup>1 2 3</sup>

Kern County Rule 424<sup>1</sup>

District Rule 1100, Equipment Breakdown, (as amended December 17, 1992)<sup>5</sup>

District Rule 1160, Emission Statements (as adopted November 18, 1992)<sup>5</sup>

District Rule 1081, Source Sampling (as amended December 16, 1993)<sup>1 2 3 6</sup>

District Rule 2010, Permits Required (as amended December 17, 1992)<sup>5</sup>

District Rule 2020, Exemptions (as amended July 21, 1994)<sup>5</sup>

District Rule 2031, Transfer of Permits (as amended December 17, 1992)<sup>5</sup>

District Rule 2040, Applications (as amended December 17, 1992)<sup>5</sup>

District Rule 2070, Standards for Granting Applications (as amended December 17, 1992)<sup>5</sup>

District Rule 2080, Conditional Approval (as amended December 17, 1992)<sup>5</sup>

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<sup>1</sup> Model General Permit Template SJV-13-0 addressed these requirements for operating permits S-1141-19-13, -26-9, -27-13, -31-11, -32-9, -33-13, -34-12, -35-14, -38-11, -39-10, -43-9, -44-12, -45-12, -46-12, -47-12, -48-12, -49-12, -50-12, -51-12, -52-12, -53-13, -55-12, -60-12, -61-12, -67-16, -70-11, -518-1, -519-1, -520-1, -521-1, -522-1, -523-2, -525-1, -526-1, -527-3, -528-3, -530-1, -531-1, -532-1, -533-1, -534-1.

<sup>2</sup> Model General Permit Template SJV-BSG-17-0 addressed these requirements for operating permits S-1141-73-3, -232-3, -233-2, -234-3, -235-2, -236-2, -238-2, -239-2, -240-3, -241-3, -242-4, -243-4, -244-3, -245-3, -246-3, -258-3, -259-3, -322-2, -323-2.

<sup>3</sup> Model General Permit Template SJV-BSG-19-0 addressed these requirements for operating permits S-1141-369-3, and S-1141-370-3.

<sup>4</sup> Model General Permit Template SJV-IC-1-0 addressed these requirements for operating permits S-1141-352-2, S-1141-353-2, S-1141-354-2, and S-1141-355-2.

<sup>5</sup> Model General Permit Template SJV-UM-0-1 addressed these requirements for operating permit S-1141-0-1

District Rule 2520, Federally Mandated Operating Permits Sections 9.1, 9.5.1, 9.6.1, 9.6.2, 9.8, 9.9.1, 9.9.2, 9.9.3, 9.9.4, 9.9.5, 9.10, 9.13.1, 9.14.1, 9.14.2, 9.17, and 10.0 (adopted June 15, 1995)<sup>5</sup>

District Rule 2520, Federally Mandated Operating Permits Sections 9.4.2<sup>1</sup>, 9.5.2<sup>1</sup>, and 13.2 (adopted June 15, 1995)<sup>1 2 3 6</sup>

District Rule 4101, Visible Emissions (as amended December 17, 1992)<sup>5</sup>

District Rule 4201, Particulate Matter Concentration (as amended December 17, 1992)<sup>1 2 3</sup>

District Rule 4201, Particulate Matter Concentration Section 3.1 (as amended December 17, 1992)<sup>1</sup>

District Rule 4301, Fuel Burning Equipment (as amended December 17, 1992)<sup>1 2 3</sup>

District Rule 4401, Steam-Enhanced Crude Oil Production Well Vents excluding sections 5.1, and 5.2 (as amended January 15, 1998)<sup>6</sup>

District Rule 4601 Architectural Coatings (as amended December 17, 1992)<sup>5</sup>

District Rules 8020, 8030, and 8060, Fugitive Dust (PM-10) Emissions (as amended April 25, 1996)<sup>5</sup>

40 CFR Part 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units<sup>3</sup>

40 CFR Part 61, Subpart M, National Emission Standard for Asbestos<sup>5</sup>

40 CFR Part 82, Subpart F, Stratospheric Ozone<sup>5</sup>

## **VII. APPLICABLE REQUIREMENTS NOT ADDRESSED BY GENERAL PERMIT TEMPLATES**

District New and Modified Stationary Source Review Rule

Kern County Rule 407

Kern County Rule 424

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<sup>6</sup> Model General Permit Template SJV-WV-1-1 addressed these requirements for operating permits S-1141-250-8, -251-7, -253-9, -263-8, -320-4, -331-9, -365-3, -366-3, and -367-3.

Kern County Rule 425

District Rule 1070, Inspections (as amended December 17, 1992)

District Rule 1080, Stack Monitoring (as amended December 17, 1992)

District Rule 1081, Source Sampling (as amended December 16, 1993)

District Rule 1100, Equipment Breakdown (as amended December 17, 1992)

District Rule 2010, Permits Required (as amended December 17, 1992)

District Rule 2080, Conditional Approval (as amended December 17, 1992)

District Rule 2520, Federally Mandated Operating Permits Sections 9.4.2, and 9.5.2 (adopted June 15, 1995)

District Rule 4101, Visible Emissions (as amended December 17, 1992)

District Rule 4201, Particulate Matter Concentration Section 3.1 (as amended December 17, 1992)

District Rule 4301, Fuel Burning Equipment (as amended December 17, 1992)

District Rule 4305, Boilers, Steam Generators, and Process Heater (as amended December 19, 1996)

District Rule 4401, Steam-Enhanced Crude Oil Production Well Vents (as amended January 15, 1998)

District Rule 4405, Oxides of Nitrogen Emissions from Existing Steam Generators Used in Thermally Enhanced Oil Recovery - Central and Western Kern County Fields (as amended December 17, 1992)

District Rule 4406, Sulfur Compounds from Oil-field Steam Generators – Kern County (as amended December 17, 1992)

District Rule 4407, IN-SITU Combustion Well Vents Section 2.0, 3.4, and 3.5 (adopted May 19, 1994)

District Rule 4621, Gasoline Transfer into Stationary Storage Containers, Delivery Vessels, and Bulk Plants Section 5.2.2 (as amended June 18, 1998)

District Rule 4622, Gasoline Transfer into Motor Vehicle Fuel Tanks (as amended June 18, 1998)

40 CFR Part 52 Subpart A Prevention of Significant Deterioration of Air Quality

District Rule 4623, Storage of Organic Liquids (as amended December 17, 1992)

40 CFR Part 60, Subpart K and Ka, Standards of Performance for Volatile Organic Liquid Storage Vessels

40 CFR Part 60, Subpart Kb, Sections 60.112b, Sections 60.113b, Standards of Performance for Volatile Organic Liquid Storage Vessels

40 CFR 63, Subpart HH - National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities

## **VIII. REQUIREMENTS NOT FEDERALLY ENFORCEABLE**

For each Title V source, the District issues a single permit that contains the Federally Enforceable requirements, as well as the District-only requirements. The District-only requirements are not a part of the Title V Operating Permits. The terms and conditions that are part of the facility's Title V permit are designated as Federally Enforceable Through Title V Permit.

This facility is subject to the following rules that are not currently federally enforceable:

1. District Rule 4102, Nuisance (as amended December 17, 1992)
  - Condition 40 of the requirements for permit unit S-1141-0-1 are based on this rule and is not Federally Enforceable through Title V.
2. District Rule 4305, Boilers, Steam Generators, and Process Heater (as amended December 19, 1996)
  - Condition 14 of the requirements for permit units S-1141-403-5, -404-3, -405-2, -406-2, and -407-2 are based on this rule and are not Federally Enforceable through Title V.

## **IX. COMPLIANCE**

- A. Requirements Addressed by Model General Permit Templates



1. Facility Wide Requirements

The applicant is proposing to use a general permit template to address federally applicable facility-wide requirements. Section IV of template SJV-UM-0-1 includes a demonstration of compliance for all applicable requirements. Template conditions have been added to the facility wide requirements S-1141-0-1 as condition numbers 1 through 39 to assure compliance with these requirements.

2. Steam Generator

The applicant is proposing to use general permit templates to address federally applicable requirements for the Steam Generators, S-1141-19-13, -26-9, -27-13, -31-11, -32-9, -33-13, -34-12, -35-14, -38-11, -39-10, -43-9, -44-12, -45-12, -46-12, -47-12, -48-12, -49-12, -50-12, -51-12, -52-12, -53-13, -55-12, -60-12, -61-12, -67-16, -70-11, -518-1, -519-1, -520-1, -521-1, -522-1, -523-2, -525-1, -526-1, -527-3, -528-3, -530-1, -531-1, -532-1, -533-1, -534-1. Section IV of template SJV-BSG-13-0 includes a demonstration of compliance for applicable requirements. Template conditions have been added to the requirements for permit units S-1141-19-13, -26-9, -27-13, -31-11, -32-9, -33-13, -34-12, -35-14, -38-11, -39-10, -40-9, -41-9, -42-9, -43-9, -44-12, -45-12, -46-12, -47-12, -48-12, -49-12, -50-12, -51-12, -52-12, -53-13, -55-12, -60-12, -61-12, -67-16, -70-11, -518-1, -519-1, -520-1, -521-1, -522-1, -523-2, -525-1, -526-1, -527-3, -528-3, -530-1, -531-1, -532-1, -533-1, -534-1 as condition numbers 1 to 16 to assure compliance with these requirements.

3. Heater Treater

The applicant is proposing to use general permit templates to address federally applicable requirements for the Heater Treater, S-1141-73-3, -232-3, -233-2, -234-3, -235-2, -236-2, -238-2, -239-2, -240-3, -241-3, -242-4, -243-4, -244-3, -245-3, -246-3, -258-3, -259-3, -322-2, and -323-2. Section IV of template SJV-BSG-17-0 includes a demonstration of compliance for applicable requirements. Template conditions have been added to the requirements for permit units S-1141-73-3, -232-3, -233-2, -234-3, -235-2, -236-2, -238-2, -239-2, -240-3, -241-3, -242-4, -243-4, -244-3, -245-3, -246-3, -258-3, -259-3, -322-2, and -323-2 as condition numbers 1 to 14 to assure compliance with these requirements.

4. Steam Generator

The applicant is proposing to use general permit templates to address federally applicable requirements for the Steam Generators, S-1141-369-3, and S-1141-370-3. Section IV of template SJV-BSG-19-0 includes a demonstration of compliance for applicable requirements. Template conditions have been added to the requirements for permit units S-1141-369-3, and S-1141-370-3 as condition numbers 1 to 14 to assure compliance with these requirements.

5. Thermally Enhanced Oil Recovery (TEOR)

The applicant is proposing to use general permit templates to address federally applicable requirements for the Steam Enhanced Wells, S-1141-250-8, -251-7, -253-9, -263-8, -320-4, -331-9, -364-2, -365-3, -366-3, and -367-3. Section IV of the template SJV-WV-1-1 includes a demonstration of compliance for applicable requirements. Template conditions have been added to the requirements for permit unit S-1141-250-8, -251-7, -253-9, -263-8, -320-4, -331-9, -365-3, -366-3, and -367-3 as condition numbers 1 to 19 to assure compliance with these requirements.

6. Internal Combustion Engines

The applicant is proposing to use general permit templates to address federally applicable requirements for the Internal Combustion Engines, S-1141-352-2 through -355-2. Section IV of the template SJV-IC-1-0 includes a demonstration of compliance for applicable requirements. Template conditions have been added to the requirements for permit unit S-1141-352-2 through -355-2 as condition numbers 1 to 11 to assure compliance with these requirements.

**B. Requirements Not Addressed by Model General Permit Templates**

**1. New and Modified Stationary Source Review Rule (District NSR Rule)**

- a. Steam Generators (S-1141-9-7, -11-9, -13-8, -18-9, -20-6, -25-10, -391-4)

These units have been identified by permit condition 1 of the PTO as being a dormant unit. These units will not be evaluated at this time. Refer to section IX.B.7 for a summary of these units.

b. Steam Generators (S-1141-19-13)

Permit units S-1141-19-16 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 11 of the PTO have been included as conditions 17 to 27 of the requirements for this permit unit.
- Condition 12 of the PTO has been included as condition 28 of the requirements for this permit unit. Record retention requirement has been increased from two to five years to comply with District Rule 2520, 9.5.2.
- Conditions 13 and 15 of the PTO have been included as conditions 29 and 31 of the requirements for this permit unit.
- Condition 14 of the PTO has been included as condition 30 of the requirements for this permit unit. Record retention requirement has been increased from two to five years to comply with District Rule 2520, 9.5.2.

c. Steam Generators (S-1141-26-9)

Permit units S-1141-26-18 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 21 of the PTO have been included as a conditions 17 to 37 of the requirements for this permit unit.

- Condition 22 of the PTO has been included as condition 38 of the requirements for this permit unit. Record retention requirement has been increased from two to five years to comply with District Rule 2520, 9.5.2.
- Condition 23 of the PTO has been included as condition 39 of the requirements for this permit unit.

d. Steam Generator (S-1141-27-13)

Permit units S-1141-27-20 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 3 of the PTO have been included as conditions 17 to 19 of the requirements for this permit unit.
- Conditions 4 and 5 of the PTO have been included as conditions 20 and 21 of the requirements for this permit unit. Record retention requirement has been increased from two to five years to comply with District Rule 2520, 9.5.2.
- Conditions 6 to 16 of the PTO have been included as conditions 22 to 32 of the requirements for this permit unit.
- Condition 17 of the PTO has been included as condition 33 of the requirements for this permit unit. Record retention requirement has been increased from two to five years to comply with District Rule 2520, 9.5.2.
- Condition 18 of the PTO has been included as condition 34 of the requirements for this permit unit.

e. Steam Generators (S-1141-31-11)

Permit units S-1141 -31-19 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were

addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 23 of the PTO have been included as conditions 17 to 39 of the requirements for this permit unit.

f. Steam Generators (S-1141-32-9)

Permit units S-1141-32-14 were subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 and 2 of the PTO have been included as conditions 17 and 18 of the requirements for this permit unit.
- Conditions 3 and 4 of the PTO have been included as conditions 19 and 20 of the requirements for this permit unit. Record retention requirement has been increased from two to five years to comply with District Rule 2520, 9.5.2.
- Conditions 5 to 15 of the PTO have been included as conditions 21 to 31 of the requirements for this permit unit.
- Condition 16 of the PTO has been included as condition 32 of the requirements for this permit unit. Record retention requirement has been increased from two to five years to comply with District Rule 2520, 9.5.2.
- Condition 17 of the PTO has been included as condition 33 of the requirements for this permit unit.

g. Steam Generators (S-1141-33-13)

Permit units S-1141-33-20 were subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 3 of the PTO have been included as conditions 17 to 19 of the requirements for this permit unit.
- Conditions 4 and 5 of the PTO have been included as conditions 20 and 21 of the requirements for this permit unit. Record retention requirement has been increased from two to five years to comply with District Rule 2520, 9.5.2.
- Conditions 6 to 16 of the PTO have been included as conditions 22 to 32 of the requirements for this permit unit.
- Condition 17 of the PTO has been included as condition 33 of the requirements for this permit unit.
- Conditions 18 and 19 of the PTO have been included as conditions 34 and 36 of the requirements for this permit unit.

h. Steam Generator (S-1141-34-12)

Permit units S-1141-34-19 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 3 of the PTO have been included as conditions 17 to 19 of the requirements for this permit unit.
- Conditions 4 and 5 of the PTO have been included as conditions 20 and 21 of the requirements for this permit unit. Record retention requirement has been increased from two to five years to comply with District Rule 2520, 9.5.2.
- Conditions 6 to 16 of the PTO have been included as conditions 22 to 32 of the requirements for this permit unit.
- Condition 17 of the PTO has been included as condition 33 of the requirements for this permit unit. Record retention requirement has been increased from two to five years to comply with District Rule 2520, 9.5.2.

- Condition s 18 and 19 of the PTO have been included as conditions 34 and 35 of the requirements for this permit unit.

i. Steam Generator (S-1141-35-14)

Permit units S-1141-35-21 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 3 of the PTO have been included as conditions 17 to 19 of the requirements for this permit unit.
- Conditions 4 and 5 of the PTO have been included as conditions 20 and 21 of the requirements for this permit unit. Record retention requirement has been increased from two to five years to comply with District Rule 2520, 9.5.2.
- Conditions 6 to 16 of the PTO have been included as conditions 22 to 32 of the requirements for this permit unit.
- Condition 17 of the PTO has been included as condition 33 of the requirements for this permit unit. Record retention requirement has been increased from two to five years to comply with District Rule 2520, 9.5.2.
- Condition s 18 and 19 of the PTO have been included as conditions 34 and 36 of the requirements for this permit unit.

j. Steam Generator (S-1141-38-11)

Permit units S-1141-38-17 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 16 of the PTO have been included as conditions 17 to 32 of the requirements for this permit unit.
- Condition 17 of the PTO has been included as condition 33 of the requirements for this permit unit. Record retention requirement has been increased from two to five years to comply with District Rule 2520, 9.5.2.
- Condition 18 of the PTO has been included as condition 34 of the requirements for this permit unit.

k. Steam Generator (S-1141-39-10)

Permit units S-1141-39-15 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 14 of the PTO have been included as conditions 17 to 30 of the requirements for this permit unit.
- Condition 15 of the PTO has been included as condition 31 of the requirements for this permit unit. Record retention requirement has been increased from two to five years to comply with District Rule 2520, 9.5.2.
- Condition 16 of the PTO has been included as condition 32 of the requirements for this permit unit.

l. Steam Generator (S-1141-43-9)

Permit units S-1141-43-14 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 23 of the PTO have been included as conditions 17 to 39 of the requirements for this permit unit.



- Condition 24 of the PTO has been included as condition 40 of the requirements for these permit units. Record retention requirement has been increased from two to five years to comply with District Rule 2520, 9.5.2.
- Condition 25 of the PTO has been included as condition 41 of the requirements for this permit unit.

m. Steam Generator (S-1141-44-12)

Permit unit S-1141-44-19 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 34 of the PTO have been included as conditions 17 to 50 of the requirements for this permit unit.
- Condition 35 of the PTO has been included as condition 51 of the requirements for this permit unit. Record retention requirement has been increased from two to five years to comply with District Rule 2520, 9.5.2.
- Condition 36 of the PTO has been included as condition 52 of the requirements for this permit unit.

n. Steam Generator (S-1141-45-12)

Permit unit S-1141-45-19 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 34 of the PTO have been included as conditions 17 to 50 of the requirements for this permit unit.
- Condition 35 of the PTO has been included as condition 51 of the requirements for this permit unit. Record

retention requirement has been increased from two to five years to comply with District Rule 2520, 9.5.2.

- Condition 36 of the PTO has been included as condition 52 of the requirements for this permit unit.

o. Steam Generator (S-1141-46-12)

Permit unit S-1141-46-19 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 36 of the PTO have been included as conditions 17 to 52 of the requirements for this permit unit.
- Condition 37 of the PTO has been included as condition 53 of the requirements for this permit unit. Record retention requirement has been increased from two to five years to comply with District Rule 2520, 9.5.2.
- Condition 38 of the PTO has been included as condition 54 of the requirements for this permit unit.

p. Steam Generator (S-1141-47-12)

Permit unit S-1141-47-18 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 14 of the PTO have been included as conditions 17 to 30 of the requirements for this permit unit.
- Condition 15 of the PTO has been included as condition 31 of the requirements for this permit unit. Record retention requirement has been increased from two to five years to comply with District Rule 2520, 9.5.2.

- Condition 16 of the PTO has been included as condition 32 of the requirements for this permit unit.

q. Steam Generator (S-1141-48-12)

Permit unit S-1141-48-17 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 10 of the PTO have been included as conditions 17 to 26 of the requirements for this permit unit.
- Conditions 11 and 13 of the PTO have been included as conditions 27 and 29 of the requirements for this permit unit. Record retention requirement has been increased from two to five years to comply with District Rule 2520, 9.5.2.
- Conditions 12 and 14 of the PTO have been included as conditions 28 and 30 of the requirements for this permit unit.

r. Steam Generators (S-1141-49-12, -50-12, -51-12)

Permit units S-1141-49-17, -50-15, and -51-17 were subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 10 of the PTO have been included as conditions 17 to 26 of the requirements for these permit units.
- Condition 11 of the PTO has been included as condition 27 of the requirements for these permit units. Record retention requirement has been increased from two to five years to comply with District Rule 2520, 9.5.2.

- Conditions 12 and 14 of the PTO have been included as conditions 28 and 30 of the requirements for these permit units.
- Condition 13 of the PTO has been included as condition 29 of the requirements for these permit units. Record retention requirement has been increased from two to five years to comply with District Rule 2520, 9.5.2.

s. Steam Generator (S-1141-52-12)

Permit unit S-1141-52-19 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 29 of the PTO have been included as conditions 17 to 45 of the requirements for this permit unit.
- Condition 30 of the PTO has been included as condition 46 of the requirements for this permit unit. Record retention has been increased from two to five years to comply with District Rule 2520, 9.5.2.
- Condition 31 of the PTO has been included as condition 47 of the requirements for this permit unit.

t. Steam Generators (S-1141-53-13, -55-12, -60-12)

Permit units S-1141-53-20, -55-19, -60-19 were subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 34 of the PTO have been included as conditions 17 to 50 of the requirements for these permit units.
- Condition 35 of the PTO has been included as condition 51 of the requirements for these permit units. Record

retention requirement has been increased from two to five years to comply with District Rule 2520, 9.5.2.

- Condition 36 of the PTO has been included as condition 52 of the requirements for these permit units.

u. Steam Generator (S-1141-61-12)

Permit units S-1141-61-19 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 28 of the PTO have been included as condition 17 to 44 of the requirements for this permit unit.
- Condition 29 of the PTO has been included as condition 45 of the requirements for this permit unit. Record retention has been increased from two to five years to comply with District Rule 2520, 9.5.2.
- Condition 30 of the PTO has been included as condition 46 of the requirements for this permit unit.

v. Steam Generator (S-1141-67-16)

Permit unit S-1141-67-15 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 6 of the PTO have been included as conditions 17 to 22 of the requirements for this permit unit.
- Condition 7 of the PTO has been included as condition 3 of the requirements for this permit unit.
- Conditions 8 to 11 of the PTO have been included as conditions 23 to 26 of the requirements for this permit unit.

- Condition 12 of the PTO has been included as condition 27 of the requirements for this permit unit. This condition has been modified by removing start-up source testing date requirement since the condition is extraneous once the condition has been complied with.
- Conditions 13 to 21 of the PTO have been included as conditions 28 to 36 of the requirements for this permit unit.
- Condition 22 of the PTO has been included as condition 37 of the requirements for this permit unit. Record retention has been increased from two to five years to comply with District Rule 2520, 9.5.2.
- Condition 23 of the PTO has been included as condition 38 of the requirements for this permit unit.

w. Steam Generators (S-1141-70-11)

Permit units S-1141-70-15 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 3 of the PTO have been included as conditions 17 to 19 of the requirements for this permit unit.
- Condition 4 of the PTO has been included as condition 20 of the requirements for this permit unit. Record retention requirement has been increased from two to five years to comply with District Rule 2520, 9.5.2.
- Conditions 5 to 16 of the PTO have been included as conditions 21 to 32 of the requirements for this permit unit.
- Condition 17 of the PTO has been included as condition 33 of the requirements for this permit unit. Record retention requirement has been increased from two to five years to comply with District Rule 2520, 9.5.2.
- Condition 18 of the PTO has been included as condition 34 of the requirements for this permit unit.

x. Heater Treaters (S-1141-73-3)

Permit units S-1141-73-7 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 3 of the PTO have been included as condition 15 to 17 of the requirements for this permit unit.
- Condition 4 of the PTO has been included as condition 18 of the requirements for this permit unit. Record retention requirement has been increased from two to five years to comply with District Rule 2520, 9.5.2.
- Conditions 5 to 13 of the PTO have been included as condition 19 to 27 of the requirements for this permit unit.

y. Storage Tank (S-1141-88-2)

Permit unit S-1141-88-4 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO has been included as condition 1 of the requirements for this permit unit.
- Condition 2 of the PTO has been included as condition 2 of the requirements for this permit unit.
- Condition 3 of the PTO has been included as condition 3 of the requirements for this permit unit.
- Condition 4 of the PTO has been included as condition 4 of the requirements for this permit unit.
- Condition 5 of the PTO has been included as condition 5 of the requirements for this permit unit.
- Condition 6 of the PTO has been included as condition 6 of the requirements for this permit unit.
- Condition 7 of the PTO has been included as condition 7 of the requirements for this permit unit.

- Condition 8 of the PTO has been included as condition 8 of the requirements for this permit unit.
- Condition 9 of the PTO has been included as condition 9 of the requirements for this permit unit.
- Condition 10 of the PTO has been included as condition 10 of the requirements for this permit unit.
- Condition 11 of the PTO has been included as condition 11 of the requirements for this permit unit.
- Condition 12 of the PTO has been included as condition 12 of the requirements for this permit unit.
- Condition 13 of the PTO has been included as condition 13 of the requirements for this permit unit.
- Condition 14 of the PTO has been included as condition 14 of the requirements for this permit unit.
- Condition 15 of the PTO has been included as condition 15 of the requirements for this permit unit.
- Condition 16 of the PTO has been included as condition 16 of the requirements for this permit unit.
- Condition 17 of the PTO has been included as condition 17 of the requirements for this permit unit.

z. Storage Tank (S-1141-89-2, -90-2, -91-2, -105-2, and -106-2)

Permit unit S-1141-89-4, -90-4, -91-4, -105-4, and -106-4 were subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 13 of the PTO have been included as conditions 1 to 13 of the requirements for these permit units.

aa. Storage Tank (S-1141-111-1 through -116-1, -119-1 through -121-1, -126-1)

Permit units S-1141-111-0 through -116-0, -119-0 through -121-0, -126-0 were subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC).



In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO refers to conditions 1 and 2 of the facility wide permit S-1141-0-0 which have been included as conditions 40 and 41 of the facility wide requirements S-1141-0-1.

bb. Storage Tank (S-1141-127-1)

Permit unit S-1141-127-2 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 16 of the PTO have been included as conditions 15 to 30 of the requirements for this permit unit.

cc. Storage Tank (S-1141-128-1, -129-4, -130-1, -131-1, -132-1)

Permit units S-1141-128-2, -129-2, -130-2, -131-2, -132-2 were subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 4 of the PTO have been included as conditions 17 to 20 of the requirements for these permit units.
- Condition 5 of the PTO has been subsumed by condition 2 of the requirements for these permit units.
- Condition 6 of the PTO has been included as condition 21 of the requirements for these permit units.

- dd. Storage Tank (S-1141-136-1 through -145-1, -156-1 through -159-1, -161-1 through -171-1, -174-1, -181-1 through -187-1, -199-1, -205-1, -212-1 through -215-1)

Permit units S-1141-136-0 through -145-0, -156-0 through -159-0, -161-0 through -171-0, -174-0, -181-0 through -187-0, -199-0, -205-0, -212-0 through -215-0 were subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO refers to conditions 1 and 2 of the facility wide permit S-1141-0-0 which have been included as conditions 40 and 41 of the facility wide requirements S-1141-0-1.

- ee. Heater Treater (S-1141-232-3)

Permit unit S-1141-232-7 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 and 2 of the PTO have been included as condition 15 and 16 of the requirements for this permit unit.
- Condition 3 of the PTO has been included as condition 17 of the requirements for this permit unit. Record retention requirement has been increased from two to five years to comply with District Rule 2520, 9.5.2.
- Conditions 4 to 12 of the PTO have been included as condition 18 to 26 of the requirements for this permit unit.

- ff. Heater Treaters (S-1141-233-2, -235-2, -236-2, -238-2, -239-2)

Permit units S-1141-233-4, -235-4, -236-4, -238-4, -239-4 were subject to the District NSR Rule at the time the

applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 3 of the PTO have been included as conditions 15 to 17 of the requirements for this permit unit.

gg. Heater Treaters (S-1141-234-3, -241-3, -242-4)

Permit units S-1141-234-7, -241-7, and -242-8 were subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 2 of the PTO have been included as conditions 15 to 16 of the requirements for these permit units.
- Condition 3 of the PTO has been included as condition 17 of the requirements for this permit unit. Record retention requirement has been increased from two to five years to comply with District Rule 2520, 9.5.2.
- Conditions 4 to 12 of the PTO have been included as conditions 18 to 26 of the requirements for these permit units.

hh. Heater Treater (S-1141-240-3)

Permit unit S-1141-240-7 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 and 2 of the PTO have been included as conditions 15 and 16 of the requirements for this permit unit.
- Condition 3 of the PTO has been included as condition 17 of the requirements for this permit unit. Record retention has been increased from two to five years to comply with District Rule 2520, 9.5.2.
- Conditions 4 to 12 of the PTO have been included as conditions 18 to 26 of the requirements for this permit unit.

ii. Heater Treaters (S-1141-243-4)

Permit units S-1141-243-8 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 and 2 of the PTO have been included as conditions 15 and 16 of the requirements for these permit units.
- Condition 3 of the PTO has been included as condition 17 of the requirements for these permit units. Record retention requirement has been increased from two to five years to comply with District Rule 2520, 9.5.2.
- Conditions 4 to 12 of the PTO have been included as conditions 18 to 26 of the requirements for these permit units.

jj. Heater Treaters (S-1141-244-3, -245-3)

Permit units S-1141-244-7, and -245-7 were subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 and 2 of the PTO have been included as conditions 15 and 16 of the requirements for these permit units.
- Condition 3 of the PTO has been included as condition 17 of the requirements for these permit units. Record retention requirement has been increased from two to five years to comply with District Rule 2520, 9.5.2.
- Conditions 4 to 12 of the PTO have been included as conditions 18 to 26 of the requirements for these permit units.

kk. Heater Treaters (S-1140-246-3)

Permit unit S-1141-246-7 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 3 of the PTO have been included as condition 15 to 17 of the requirements for this permit unit.
- Condition 4 of the PTO has been included as condition 18 of the requirements for this permit unit. Record retention requirement has been increased from two to five years to comply with District Rule 2520, 9.5.2.
- Conditions 5 to 13 of the PTO have been included as condition 19 to 27 of the requirements for this permit unit.

ll. Thermally Enhanced Oil Recovery (TEOR) (S-1141-250-8)

Permit unit S-1141-250-2 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO has been included as condition 20 of the requirements for this permit unit.

- Condition 2 of the PTO has been subsumed by condition 6 of the requirements for this permit unit.
- Conditions 3 to 5 of the PTO have been included as conditions 21 to 23 of the requirements for this permit unit.

mm. Thermally Enhanced Oil Recovery (TEOR) (S-1141-251-7, -253-9, -263-8)

Permit units S-1141-251-8, -253-10, and -263-9 were subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1, 2, and 3 of the PTO has been subsumed by conditions 6, 12, and 8 of the requirements for this permit unit.
- Conditions 4 and 5 of the PTO has been included as conditions 20 and 21 of the requirements for this permit unit.
- Condition 6 of the PTO has been included as condition 22 of the requirements for this permit unit. Record retention requirement has been increased from two to five years to comply with District rule 2520, 9.5.2.

nn. Heater Treater (S-1141-258-3)

Permit unit S-1141-258-7 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 2 of the PTO have been included as conditions 15 to 16 of the requirements for these permit units.
- Condition 3 of the PTO has been included as condition 17 of the requirements for this permit unit. Record

retention requirement has been increased from two to five years to comply with District Rule 2520, 9.5.2.

- Conditions 4 to 12 of the PTO have been included as conditions 18 to 26 of the requirements for these permit units.

oo. Heater Treaters (S-1141-259-3)

Permit unit S-1141-259-7 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 4 of the PTO have been included as conditions 15 to 18 of the requirements for this permit unit.
- Condition 5 of the PTO has been included as condition 19 of the requirements for this permit unit. Record retention requirement has been increased from two to five years to comply with District Rule 2520, 9.5.2.
- Conditions 6 to 14 of the PTO have been included as conditions 20 to 28 of the requirements for this permit unit.

pp. Thermally Enhanced Oil Recovery (TEOR) (S-1141-317-2)

Permit unit S-1141-317-0 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO has been subsumed by condition 6 of the requirements for this permit unit.
- Conditions 2 to 6 of the PTO have been included as conditions 17 to 21 of the requirements for this permit unit.

- Condition 7 of the PTO has been included as condition 22 of the requirements for this permit unit. Record retention requirement has been increased from two to five years to comply with District Rule 2520, 9.5.2.

qq. Thermally Enhanced Oil Recovery (TEOR) (S-1141-320-4)

Permit unit S-1141-320-3 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 7 of the PTO have been included as conditions 20 to 25 of the requirements for this permit unit.
- Conditions 7 and 8 of the PTO have been subsumed by conditions 8 and 6 of the requirements for this permit unit.
- Condition 9 of the PTO has been included as condition 26 of the requirements for this permit unit.

rr. Heater Treater (S-1141-322-2)

Permit unit S-1141-244-322-5 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 2 of the PTO have been included as conditions 15 to 16 of the requirements for these permit units.
- Condition 3 of the PTO has been included as condition 17 of the requirements for these permit units. Record retention requirement has been increased from two to five years to comply with District Rule 2520, 9.5.2.



- Conditions 4 to 12 of the PTO have been included as conditions 18 to 26 of the requirements for these permit units.

ss. Heater Treater (S-1141-323-2)

Permit unit S-1141-323-5 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 and 2 of the PTO have been included as conditions 15 and 16 of the requirements for these permit units.
- Condition 3 of the PTO has been included as condition 17 of the requirements for these permit units. Record retention requirement has been increased from two to five years to comply with District Rule 2520, 9.5.2.
- Conditions 4 to 12 of the PTO have been included as conditions 18 to 26 of the requirements for these permit units.

tt. Thermally Enhanced Oil Recovery (TEOR) (S-1141-331-9)

Permit units S-1141-331-8 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 and 2 of the PTO have been included as conditions 20 and 21 of the requirements for this permit unit.
- Conditions 3 and 4 of the PTO have been subsumed by conditions 12 and 8 of the requirements for this permit unit.

- Conditions 5 to 8 of the PTO have been included as conditions 22 to 25 of the requirements for this permit unit.

- uu. Diesel-Fired IC Engine Engines (S-1141-352-2, -353-2, -354-2, -355-2)

Permit units S-1141-352-0, -353-0, -354-0, -355-0 were subject to the District NSR Rule at the time the applicant applied for Authority to Construct (PTO). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 and 2 of the PTO has been included as conditions 40 and 41 of the facility wide requirements.

- w. Thermally Enhanced Oil Recovery (TEOR) (S-1141-365-3)

Permit unit S-1141-365-4 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 8 of the PTO have been included as conditions 20 to 27 of the requirements for this permit unit.
- Conditions 9 and 10 of the PTO have been subsumed by conditions 8 and 6 of the requirements for this permit unit.
- Condition 11 of the PTO has been included as condition 28 of the requirements for this permit unit.

- ww. Thermally Enhanced Oil Recovery (TEOR) (S-1141-366-3)

Permit unit S-1141-366-4 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were

addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO has been included as condition 40 of the facility wide requirements.
- Conditions 2 to 8 of the PTO have been included as conditions 20 to 26 of the requirements for this permit unit.
- Conditions 9 and 10 of the PTO have been subsumed by conditions 8 and 6 of the requirements for this permit unit.
- Condition 11 of the PTO has been included as condition 27 of the requirements for this permit unit.

xx. Thermally Enhanced Oil Recovery (TEOR) (S-1141-367-3)

Permit unit S-1141-367-1 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 6 of the PTO have been included as conditions 20 to 25 of the requirements for this permit unit.
- Conditions 7 and 8 of the PTO have been subsumed by conditions 8 and 6 of the requirements for this permit unit.

yy. Steam Generators (S-1141-368-7, -374-6, -377-7)

Permit units S-1141-368-6, -374-5, and -377-6 were subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 16 of the PTO have been included as conditions 11 to 26 of the requirements for these permit units.
- Condition 17 of the PTO has been included as condition 27 of the requirements for these permit units. Record retention requirement has been increased from two to five years to comply with District Rule 2520, 9.5.2.
- Condition 18 of the PTO has been included as condition 28 of the requirements for these permit units.

zz. Steam Generator (S-1141-369-3, -370-3)

Permit units S-1141-369-8 and -370-8 were subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 16 of the PTO have been included as conditions 15 to 30 of the requirements for these permit units.
- Condition 17 of the PTO has been included as condition 30 of the requirements for these permit units.. Record retention requirement has been increased from two to five years to comply with District Rule 2520, 9.5.2.
- Condition 18 of the PTO has been included as condition 31 of the requirements for these permit units.

aaa. Steam Generators (S-1141-371-7, -373-7, -376-7, -378-7, -380-7)

Permit units S-1141-371-6, -373-6, -376-6, -378-6 and -380-6 were subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 15 of the PTO have been included as conditions 11 to 25 of the requirements for these permit units.
- Condition 16 of the PTO has been included as condition 26 of the requirements for these permit units. Record retention requirement has been increased from two to five years to comply with District Rule 2520, 9.5.2.
- Condition 17 of the PTO has been included as condition 27 of the requirements for these permit units.

bbb. Steam Generator (S-1141-372-6)

Permit units S-1141-372-5 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 18 of the PTO have been included as conditions 12 to 29 of the requirements for this permit unit.
- Condition 19 of the PTO has been included as condition 30 of the requirements for this permit unit. Record retention requirement has been increased from two to five years to comply with District Rule 2520, 9.5.2.
- Condition 20 of the PTO has been included as condition 31 of the requirements for this permit unit.

ccc. Heavy Crude Oil Truck Loading Operation (S-1141-385-1, -386-1)

Permit units S-1141-385-0, and -386-0 were subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 to 9 of the PTO has been included as condition 1 to 9 of the requirements for these permit units.

ddd. Storage Tank (S-1141-387-1, and -388-1)

Permit units S-1141-387-0, and -388-0 were subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO refers to conditions 1 and 2 of the facility wide permit S-1141-0-0 which have been included as conditions 40 and 41 of the facility wide requirements S-1141-0-1.

eee. Heater Treaters (S-1141-389-2)

Permit unit S-1141-389-0 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO has been included as condition 40 of the facility wide requirements.
- Condition 2 of the PTO has been included as condition 12 of the requirements for this permit unit.

fff. Steam Generator (S-1141-392-4)

Permit units S-1141-392-3 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO has been included as condition 3 of the requirements for this permit unit.
- Conditions 2 to 24 of the PTO have been included as conditions 14 to 36 of the requirements for this permit unit.
- Condition 25 of the PTO has been included as condition 37 of the requirements for this permit unit. Record retention has been increased from two to five years to comply with District Rule 2520, 9.5.2.
- Condition 26 of the PTO have been included as conditions 38 of the requirements for this permit unit.

ggg. Steam Generator (S-1141-394-4)

Permit units S-1141-394-5 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO has been included as condition 3 of the requirements for this permit unit.
- Conditions 2 to 23 of the PTO have been included as conditions 12 to 33 of the requirements for this permit unit.

hhh. Steam Generator (S-1141-396-4)

Permit units S-1141-396-5 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO has been included as condition 3 of the requirements for this permit unit.
- Conditions 2 to 24 of the PTO have been included as conditions 14 to 36 of the requirements for this permit unit.

iii. Steam Generator (S-1141-402-6)

Permit units S-1141-402-7 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO has been included as condition 5 of the requirements for this permit unit.
- Conditions 2 to 22 of the PTO have been included as conditions 11 to 31 of the requirements for this permit unit.

jjj. Heater Treaters (S-1141-403-5, -404-3, 405-2, -406-2, -407-2, -408-2)

Permit units S-1141-403-3, -404-1, -405-1, -406-1, -407-1, and -408-1 were not subject to the District NSR Rule at the time they were installed. The units were issued In-house Permits to Operate (PTO) as existing equipment. The units are required to be permitted when the District Rule 2020 exemption levels changed.

- Conditions 1 to 3 of the PTO have been included as conditions 12 to 14 of the requirements for these permit units.

kkk. Thermally Enhanced Oil Recovery (TEOR) (S-1141-409-2)

Permit unit S-1141-409-1 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 and 2 of the PTO have been included as conditions 17 and 18 of the requirements for this permit unit.



- Condition 3 of the PTO has been subsumed by condition 6 of the requirements for this permit unit.
- Conditions 4 to 9 of the PTO have been included as conditions 19 to 24 of the requirements for this permit unit.

III. Thermally Enhanced Oil Recovery (TEOR) (S-1141-410-2)

Permit unit S-1141-410-0 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 and 2 of the PTO have been included as conditions 17 and 18 of the requirements for this permit unit.
- Conditions 3, 4, and 5 of the PTO have been subsumed by conditions 6, 12, and 11 respectively of the requirements for this permit unit.
- Conditions 6 and 7 of the PTO have been included as conditions 19 and 20 of the requirements for this permit unit.

mmm. Thermally Enhanced Oil Recovery (TEOR) (S-1141-411-1)

Permit unit S-1141-411-0 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 5 of the PTO have been included as conditions 17 to 21 of the requirements for this permit unit.
- Condition 6 of the PTO has been subsumed by condition 6 of the requirements for this permit unit.

- Conditions 7 to 18 of the PTO have been included as conditions 22 to 33 of the requirements for this permit unit.

nnn. Storage Tank (S-1141-413-2, -415-1, -416-2, -420-1, -424-1)

Permit units S-1141-413-0, -415-0, -416-0, -420-0, -424-0 were subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO refers to conditions 1 and 2 of the facility wide permit S-1141-0-0 which have been included as conditions 40 and 41 of the facility wide requirements S-1141-0-1.
- Condition 2 of the PTO has been included as condition 5 of the requirements for these permit units.

ooo. Storage Tank (S-1141-417-1)

Permit unit S-1141-417-0 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 8 of the PTO have been included as conditions 18 to 25 of the requirements for this permit unit.

ppp. Storage Tank (S-1141-418-1, -419-1, -421-1, -422-1, -423-1)

Permit units S-1141-418-0, -419-0, -421-0, -422-0, -423-0 were subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to

define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 4 of the PTO have been included as conditions 18 to 21 of the requirements for these permit units.

qqq. Thermally Enhanced Oil Recovery (TEOR) (S-1141-426-1)

Permit unit S-1141-426-0 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 7 of the PTO have been included as conditions 1 to 7 of the requirements for this permit unit.

rrr. Gasoline Transfer - Storage and Dispensing System (S-1141-427-2)

Permit units S-1141-427-1 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 4 of the PTO has been included as conditions 18 to 21 of the requirements for this permit unit.

sss. Thermally Enhanced Oil Recovery (TEOR) (S-1141-428-2)

Permit unit S-1141-428-0 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 5 of the PTO have been included as conditions 17 to 21 of the requirements for this permit unit.
- Condition 6 of the PTO has been subsumed by condition 6 of the requirements for this permit unit.
- Condition 7 to 13 of the PTO have been subsumed by conditions 22 to 28 of the requirements for this permit unit.

ttt. Storage Tank (S-1141-429-1)

Permit unit S-1141-429-0 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 4 of the PTO have been included as conditions 18 to 21 of the requirements for these permit units.

uuu. Thermally Enhanced Oil Recovery (TEOR) (S-1141-430-3)

Permit unit S-1141-430-1 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO have been included as condition 16 of the requirements for this permit unit.
- Condition 2 of the PTO has been subsumed by condition 6 of the requirements for this permit unit.
- Conditions 3 to 7 of the PTO have been included as conditions 17 to 21 of the requirements for this permit unit.

vvv. Steam Generator (S-1141-431-4, -432-2)

Permit units S-1141-431-0, and -432-0 were subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 15 of the PTO have been included as conditions 10 to 24 of the requirements for these permit units.
- Condition 16 of the PTO has been included as condition 25 of the requirements for these permit units. Record retention requirement has been increased from two to five years to comply with District Rule 2520, 9.5.2.

www. Heater Treaters (S-1141-466-1, -467-1, -468-1)

Permit units S-1141-466-0, -467-0, and -468-0 were not subject to the District NSR Rule at the time they were installed. The units were issued In-house Permits to Operate (PTO) as existing equipment. The units are required to be permitted when the District Rule 2020 exemption levels changed.

- Condition 1 of the PTO has been included as condition 40 of the facility wide requirements.
- Condition 2 of the PTO has been included as condition 22 of the facility wide requirements.
- Condition 3 of the PTO has been included as condition 4 of the requirements for these permit units.

xxx. Storage Tank (S-1141-472-1)

Permit unit S-1141-472-0 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO refers to conditions 1 and 2 of the facility wide permit S-1141-0-0 which have been included as conditions 40 and 41 of the facility wide requirements S-1141-0-1.

yyy. Storage Tank (S-1141-473-3, -474-3)

Permit units S-1141-473-0, and -474-0 were subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 13 of the PTO have been included as conditions 1 to 13 of the requirements for these permit units.

zzz. Storage Tank (S-1141-479-3)

Permit unit S-1141-479-0 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 11 of the PTO have been included as conditions 1 to 11 of the requirements for these permit units.

aaaa. Storage Tanks (S-1141-480-3, -481-3, -482-3, -483-3, -484-3, -485-3, -486-3)

Permit units S-1141-480-0, -481-0, -482-0, -483-0, -484-0, -485-0, and -486-0 were subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 10 of the PTO have been included as conditions 1 to 10 of the requirements for these permit units.

bbbb. Storage Tank (S-1141-495-3)

Permit unit S-1141-495-0 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 13 of the PTO have been included as conditions 1 to 13 of the requirements for these permit units.

cccc. Storage Tank (S-1141-496-3)

Permit unit S-1141-496-0 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 11 of the PTO have been included as conditions 1 to 11 of the requirements for these permit units.

dddd. Storage Tanks (S-1141-497-3, -498-3)

Permit units S-1141-497-0, -498-0 were subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 12 of the PTO have been included as conditions 1 to 12 of the requirements for these permit units.

eeee. Heater Treater (S-1141-499-1)

Permit unit S-1141-499-0 was not subject to the District NSR Rule at the time they were installed. The units were issued In-house Permits to Operate (PTO) as existing equipment. The units are required to be permitted when the District Rule 2020 exemption levels changed.

- Condition 1 of the PTO has been included as condition 40 of the facility wide requirements.
- Condition 2 of the PTO has been included as condition 4 of the requirements for these permit units.
- Condition 3 of the PTO has been included as condition 22 of the facility wide requirements.

ffff. Emergency Flare (S-1141-513-3)

Permit units S-1141-513-2 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO has been included as condition 40 of the facility wide requirements.
- Conditions 2 to 8 of the PTO have been included as conditions 1 to 7 of the requirements for this permit unit.
- Condition 9 of the PTO has been included as condition 8 of the requirements for this permit unit. Record retention requirement has been increased from two to five years to comply with District Rule 2520, 9.5.2.

gggg. Steam Generator (S-1141-515-1)

Permit units S-1141-515-0 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for



streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 21 of the PTO have been included as conditions 12 to 32 of the requirements for this permit unit.
- Condition 22 of the PTO has been included as condition 33 of the requirements for this permit unit. Record retention requirement has been increased from two to five years to comply with District Rule 2520, 9.5.2.
- Condition 23 of the PTO has been included as condition 41 of the facility wide requirements.

hhhh. Steam Generator (S-1141-516-1)

Permit units S-1141-516-2 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 16 of the PTO have been included as conditions 10 to 25 of the requirements for this permit unit.
- Condition 17 of the PTO has been included as condition 26 of the requirements for this permit unit. Record retention requirement has been increased from two to five years to comply with District Rule 2520, 9.5.2.
- Conditions 18 to 29 of the PTO have been included as conditions 27 to 38 of the requirements for this permit unit.

iiii. Steam Generator (S-1141-517-1)

Permit units S-1141-517-2 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were

addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 15 of the PTO have been included as conditions 11 to 25 of the requirements for these permit units.
- Condition 16 of the PTO has been included as condition 26 of the requirements for these permit units. Record retention requirement has been increased from two to five years to comply with District Rule 2520, 9.5.2.
- Conditions 17 to 29 of the PTO has been included as conditions 27 to 39 of the requirements for these permit units.

jjjj. Steam Generator (S-1141-518-1, -519-1)

Permit units S-1141-518-2, -519-2 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 21 of the PTO have been included as conditions 17 to 37 of the requirements for these permit units.
- Condition 22 of the PTO has been included as condition 3 of the requirements for these permit units.
- Condition 23 of the PTO has been included as condition 41 of the facility wide requirements.

kkkk. Steam Generator (S-1141-520-1)

Permit units S-1141-520-2 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 16 of the PTO have been included as conditions 17 to 32 of the requirements for this permit unit.
- Condition 17 of the PTO has been included as condition 3 of the requirements for this permit unit.
- Condition 18 of the PTO has been included as condition 41 of the facility wide requirements.

IIII. Steam Generator (S-1141-521-1)

Permit units S-1141-521-2 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 16 of the PTO have been included as conditions 17 to 32 of the requirements for this permit unit.
- Condition 16 of the PTO has been included as condition 32 of the requirements for these permit units. Record retention requirement has been increased from two to five years to comply with District Rule 2520, 9.5.2.
- Conditions 17 and 18 of the PTO have been included as conditions 33 and 34 of the requirements for this permit unit.
- Condition 19 of the PTO has been included as condition 3 of the requirements for this permit unit.
- Condition 20 of the PTO has been included as condition 41 of the facility wide requirements.

mmmm. Steam Generator (S-1141-522-1)

Permit units S-1141-522-2 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 14 of the PTO have been included as conditions 17 to 30 of the requirements for this permit unit.
- Condition 15 of the PTO has been included as condition 31 of the requirements for these permit units. Record retention requirement has been increased from two to five years to comply with District Rule 2520, 9.5.2.
- Conditions 16 and 17 of the PTO have been included as conditions 32 and 33 of the requirements for this permit unit.
- Condition 18 of the PTO has been included as condition 3 of the requirements for this permit unit.
- Condition 19 of the PTO has been included as condition 34 of the requirements for this permit unit.
- Condition 20 of the PTO has been included as condition 41 of the facility wide requirements.

nnnn. Steam Generator (S-1141-523-2)

Permit units S-1141-523-3 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 15 of the PTO have been included as conditions 17 to 31 of the requirements for this permit unit.
- Condition 16 of the PTO has been included as condition 32 of the requirements for these permit units. Record retention requirement has been increased from two to five years to comply with District Rule 2520, 9.5.2.
- Conditions 17 and 18 of the PTO have been included as conditions 33 and 34 of the requirements for this permit unit.
- Condition 19 of the PTO has been included as condition 3 of the requirements for this permit unit.
- Condition 20 of the PTO has been included as condition 41 of the facility wide requirements.

oooo. Steam Generator (S-1141-524-2)

Permit units S-1141-524-3 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 16 of the PTO have been included as conditions 11 to 26 of the requirements for this permit unit.
- Condition 17 of the PTO has been included as condition 27 of the requirements for this permit unit. Record retention requirement has been increased from two to five years to comply with District Rule 2520, 9.5.2.
- Conditions 18 to 23 of the PTO has been included as conditions 28 to 33 of the requirements for this permit unit.

pppp. Steam Generator (S-1141-525-1)

Permit units S-1141-525-2 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 16 of the PTO have been included as conditions 17 to 32 of the requirements for this permit unit.
- Condition 17 of the PTO has been included as condition 33 of the requirements for these permit units. Record retention requirement has been increased from two to five years to comply with District Rule 2520, 9.5.2.
- Conditions 18 to 22 of the PTO have been included as conditions 34 to 38 of the requirements for this permit unit.
- Condition 23 of the PTO has been included as condition 3 of the requirements for this permit unit.

- Condition 24 of the PTO has been included as condition 41 of the facility wide requirements.

qqqq. Steam Generator (S-1141-526-1)

Permit units S-1141-526-2 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 18 of the PTO have been included as conditions 17 to 34 of the requirements for these permit units.
- Condition 19 of the PTO has been included as condition 3 of the requirements for this permit unit.
- Condition 20 of the PTO has been included as condition 35 of the requirements for this permit unit.
- Condition 21 of the PTO has been included as condition 36 of the requirements for these permit units. Record retention requirement has been increased from two to five years to comply with District Rule 2520, 9.5.2.
- Condition 22 of the PTO has been included as condition 37 of the requirements for this permit unit.
- Condition 23 of the PTO has been included as condition 41 of the facility wide requirements.

rrrr. Steam Generator (S-1141-527-3, -528-3)

Permit units S-1141-527-2 and -528-2 were subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 15 of the PTO have been included as conditions 17 to 31 of the requirements for these permit units.

- Condition 16 of the PTO has been included as condition 32 of the requirements for these permit units. Record retention requirement has been increased from two to five years to comply with District Rule 2520, 9.5.2.
- Conditions 17 to 21 of the PTO have been included as conditions 33 to 37 of the requirements for this permit unit.
- Condition 22 of the PTO has been included as condition 3 of the requirements for this permit unit.
- Condition 23 of the PTO has been included as condition 41 of the facility wide requirements.

ssss. Steam Generator (S-1141-529-1)

Permit units S-1141-529-0 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO has been included as condition 40 of the facility wide requirements.
- Conditions 2 to 21 of the PTO have been included as conditions 10 to 29 of the requirements for these permit units.
- Condition 22 of the PTO has been included as condition 30 of the requirements for these permit units. Record retention requirement has been increased from two to five years to comply with District Rule 2520, 9.5.2.
- Condition 23 of the PTO has been included as condition 31 of the requirements for this permit unit.
- Condition 24 of the PTO has been included as condition 41 of the facility wide requirements.

tttt. Steam Generator (S-1141-530-1, -531-1, -532-1, -533-1, -534-1)

Permit units S-1141-530-2, -531-2, -532-2, -533-2, -534-2 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70

Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 16 of the PTO have been included as conditions 17 to 32 of the requirements for these permit units.
- Condition 17 of the PTO has been included as condition 33 of the requirements for these permit units. Record retention requirement has been increased from two to five years to comply with District Rule 2520, 9.5.2.
- Conditions 18 to 23 of the PTO have been included as conditions 34 to 39 of the requirements for these permit units.
- Condition 24 of the PTO has been included as condition 41 of the facility wide requirements.

uuuu. Steam Generator (S-1141-535-1)

Permit units S-1141-535-2 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 to 18 of the PTO have been included as conditions 17 to 34 of the requirements for this permit unit.
- Condition 19 of the PTO has been included as condition 35 of the requirements for this permit unit. Record retention requirement has been increased from two to five years to comply with District Rule 2520, 9.5.2.
- Conditions 20 to 25 of the PTO have been included as conditions 36 to 41 of the requirements for this permit unit.
- Condition 26 of the PTO has been included as condition 41 of the facility wide requirements.

vvv. Steam Generator (S-1141-554-1)



Permit units S-1141-554-2 was subject to the District NSR Rule at the time the applicant applied for Authority to Construct (ATC). In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

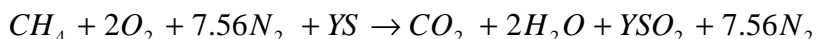
- Conditions 1 to 18 of the PTO have been included as conditions 1 to 18 of the requirements for these permit units.

## 2. Kern County Rule 407

Kern County Rule 407 limits the emission of sulfur compounds to 0.2% by volume (2000 ppmv) calculated as  $\text{SO}_2$ , on a dry basis averaged over 15 minutes.

To show compliance with this rule the following calculation will determine the gaseous fuel's sulfur content which corresponds to an exhaust concentration of 0.2% by volume of sulfur compound emissions calculated as  $\text{SO}_2$ .

Assuming that 0% excess air in the exhaust stream corresponds with maximum  $\text{SO}_x$  emissions concentration (neglecting  $\text{NO}_x$  and  $\text{SO}_x$  relative to  $\text{SO}_2$  in the exhaust) and that  $\text{CH}_4$  represents a typical gaseous fuel, the combustion equation is:



where:

Y = moles of sulfur in the fuel.

Solving an expression for the fraction of  $\text{SO}_2$  in the dry exhaust by volume gives:

$$\frac{Y}{1 + 7.56} = 0.002 \Rightarrow Y = 0.01712$$

where:

Y = mole fraction of S per mole of  $\text{CH}_4$  combusted

1 = one mole of  $\text{CO}_2$

7.56 = number of moles of N<sub>2</sub>

0.002 = 0.2% by volume = 2000 ppmv limit per County Rule 407

Use Y to calculate the weight fraction of S in one mole of CH<sub>4</sub>:

$$\frac{(0.01712)(32.06)}{(16.04) + (0.01712)(32.06)} = 0.033 \Rightarrow 3.3\% \text{ S by weight in the fuel.}$$

where:

32.06 = molecular weight of sulfur (S)

16.04 = molecular weight of methane (CH<sub>4</sub>)

0.033 = fraction of S by weight in the fuel

The preceding calculation shows that an exhaust concentration of 0.2% by volume corresponds to a gaseous fuel sulfur content by weight of 3.3%. By utilizing certified gaseous fuel with a sulfur content of less than 3.3% by weight will assure compliance with this rule.

For non-certified gaseous fuels, the limit of 3.3 weight percent sulfur is conservative for field gas, which frequently has a lower heating value and higher exhaust volume flow rate than pure methane. Operators may choose to comply with this fuel sulfur limit by fuel testing using grab sample analysis by GC-FPDD/TCD performed in the laboratory.

Conditions have been added to the following permit units to assure compliance with this rule.

- a. Steam Generator (S-1141-372-6, -389-2, -403-5, -404-3, -405-2, -406-2, -407-2, -408-2, -466-1, -467-1, -468-1, and -499-1)
  - Condition 5 to 10 of the requirements for these permit units assures compliance with this rule.
- b. Steam Generator (S-1141-392-4 and -396-4)
  - Conditions 5 to 9, and 11 of the requirements for these permit units assure compliance with this rule.

### 3. District Rule 1070, Inspections

District Rule 1070 has been submitted to the EPA to replace Kern County APCD Rule 107, which is in the SIP. The requirements of these rules are compared below in table 1, showing that the District Rule is at least as stringent as the County Rule.

**Table 1 – Comparison of District Rule 1070 to Kern County Rule 107**

REQUIREMENT	District Rule 1070	Kern County Rule 107
Inspections shall be made by the enforcement agency for the purpose of obtaining information necessary to determine whether air pollution sources are in compliance with applicable rules and regulations.	✓	✓
The District has authority to require record keeping, to make inspections and to conduct tests of air pollution sources.	✓	✓

Section 4.0 of this rule states district's authority to require record keeping, to make inspections, and to conduct tests of air pollution sources.

- a. Steam Generator (S-1141-19-13)
  - Condition 30 of the requirements for this permit unit assures compliance with this rule.
- b. Steam Generator (S-1141-26-9)
  - Condition 38 of the requirements for this permit unit assures compliance with this rule.
- c. Steam Generator (S-1141-27-13)
  - Conditions 23 and 33 of the requirements for this permit unit assure compliance with this rule.
- d. Steam Generator (S-1141-31-11)
  - Condition 35 of the requirements for this permit unit assures compliance with this rule.
- e. Steam Generator (S-1141-32-9)
  - Conditions 21 and 22 of the requirements for this permit unit assure compliance with this rule.

- f. Steam Generator (S-1141-33-13)
  - Conditions 22 and 23 of the requirements for this permit unit assure compliance with this rule.
- g. Steam Generator (S-1141-34-12)
  - Conditions 22, 23, and 33 of the requirements for this permit unit assure compliance with this rule.
- h. Steam Generator (S-1141-35-14)
  - Conditions 22 and 33 of the requirements for this permit unit assure compliance with this rule.
- i. Steam Generator (S-1141-38-11, -39-10, -43-9, -73-3, -246-3)
  - Condition 18 of the requirements for these permit units assures compliance with this rule.
- j. Steam Generator (S-1141-241-3, -242-4, -258-3)
  - Condition 17 of the requirements for these permit units assures compliance with this rule.
- k. Steam Generator (S-1141-40-9, -41-9, -42-9, 70-11)
  - Condition 23 of the requirements for these permit units assures compliance with this rule.
- l. Steam Generator (S-1141-67-16)
  - Condition 37 of the requirements for this permit unit assures compliance with this rule.
- m. Steam Generator (S-1141-232-3, -240-3, -243-4, -244-3, -245-3, -322-2, -323-2)
  - Condition 17 of the requirements for these permit units assures compliance with this rule.
- n. Steam Generator (S-1141-372-6)

- Condition 13 of the requirements for these permit units assures compliance with this rule.
- o. Steam Generator (S-1141-394-4)
  - Condition 16 of the requirements for this permit unit assures compliance with this rule.
- p. Steam Generator (S-1141-396-4)
  - Condition 19 of the requirements for this permit unit assures compliance with this rule.
- q. Steam Generator (S-1141-516-1, -517-1)
  - Condition 26 of the requirements for this permit unit assures compliance with this rule.
- r. Steam Generator (S-1141-518-1, -519-1, -521-1, -523-2)
  - Condition 32 of the requirements for these permit units assures compliance with this rule.
- s. Steam Generator (S-1141-520-1, -529-1)
  - Condition 30 of the requirements for these permit units assures compliance with this rule.
- t. Steam Generator (S-1141-522-1)
  - Condition 31 of the requirements for this permit unit assures compliance with this rule.
- u. Steam Generator (S-1141-524-2)
  - Condition 27 of the requirements for this permit unit assures compliance with this rule.
- v. Steam Generator (S-1141-525-1, -530-1, -531-1, -533-1, -534-1)

- Condition 33 of the requirements for these permit units assures compliance with this rule.
- w. Steam Generator (S-1141-526-1)
  - Condition 36 of the requirements for this permit unit assures compliance with this rule.
- x. Steam Generator (S-1141-527-3, -528-3)
  - Condition 31 of the requirements for this permit unit assures compliance with this rule.
- y. Steam Generator (S-1141-535-1)
  - Condition 35 of the requirements for this permit unit assures compliance with this rule.
- z. Steam Generator (S-1141-554-1)
  - Conditions 2 and 16 of the requirements for this permit unit assure compliance with this rule.
- aa. Thermally Enhanced Oil Recovery (TEOR) (S-1141-331-9)
  - Conditions 24 and 25 of the requirements for this permit unit assures compliance with this rule.
- bb. Thermally Enhanced Oil Recovery (TEOR) (S-1141-367-3)
  - Condition 22 of the requirements for this permit unit assures compliance with this rule.
- cc. Thermally Enhanced Oil Recovery (TEOR) (S-1141-426-1)
  - Condition 6 of the requirements for this permit unit assures compliance with this rule.
- dd. Storage Tank (S-1141-88-2)
  - Condition 15 of the requirements for this permit unit assures compliance with this rule.

- ee. Storage Tank (S-1141-479-3)
  - Condition 11 of the requirements for this permit unit assures compliance with this rule.
- ff. Storage Tank (S-1141-480-3, -481-3, -482-3, -483-3, -484-3, -485-3, -486-3)
  - Condition 10 of the requirements for these permit units assures compliance with this rule.
- gg. Storage Tank (S-1141-495-3)
  - Condition 11 of the requirements for this permit unit assures compliance with this rule.
- hh. Storage Tank (S-1141-496-3)
  - Condition 9 of the requirements for this permit unit assures compliance with this rule.
- ii. Storage Tank (S-1141-497-3, -498-3)
  - Condition 10 of the requirements for these permit units assures compliance with this rule.
- jj. Internal Combustion Engine (S-1141-352-2, -353-2, -354-2, -355-2)
  - Condition 13 of the requirements for this permit unit assure compliance with this rule.
- kk. Heavy Crude Oil Truck Loading Operation (S-1141-385-1, -386-1)
  - Condition 9 of the requirements for these permit units assure compliance with this rule.

**4. District Rule 1081, Source Sampling**

District Rule 1081 has been submitted to the EPA to replace Fresno County Rule 108.1, which is in the SIP. District Rule

1081 is as stringent as Kern County Rule 108.1, as shown on Table 2.

**Table 2 – Comparison of District Rule 1081 and Kern County Rule 108.1**

REQUIREMENTS	1081 District	108.1 Kern
Upon request of the APCO, the source shall provide info. and records to enable the APCO to determine when a representative sample can be taken.	✓	✓
The facility shall collect, have collected or allow the APCO to collect, a source sample	✓	✓
The source shall have District personnel present at a source test	✓	
The applicable test method, if not specified in the rule, shall be conducted in accordance with 40 CFR § 60, Appendix A	✓	
Test procedures: 1) arithmetic mean of three runs 2) a scheduled source test may not be discontinued solely due to the failure to meet the applicable standard(s), and 3) arithmetic mean of two runs is acceptable if circumstances beyond owner or operator control occurs.	✓	

Sections 3.0, 4.0, 5.0, 6.0, and 7.0 of District Rule 1081 set forth requirements for sampling facilities, collection of samples, test methods, test procedures, and administrative requirements, respectively.

- a. Steam Generator (S-1141-19-13)
  - Conditions 24 to 27 assure compliance with these rules.
- b. Steam Generator (S-1141-26-9)
  - Conditions 19, 33 to 36 assure compliance with these rules.
- c. Steam Generator (S-1141-27-13)
  - Conditions 28 to 31 assure compliance with this rule.
- d. Steam Generator (S-1141-31-11)
  - Conditions 18, 28 to 31 assure compliance with these rules.
- e. Steam Generator (S-1141-32-9)
  - Conditions 27 to 30 assure compliance with these rules.



- f. Steam Generator (S-1141-33-13)
  - Conditions 28 to 31 assure compliance with these rules.
- g. Steam Generator (S-1141-34-12, -35-14)
  - Conditions 17, and 28 to 31 assure compliance with these rules.
- h. Steam Generator (S-1141-38-11)
  - Conditions 27 to 30 assure compliance with these rules.
- i. Steam Generator (S-1141-40-9, -41-9, -42-9)
  - Conditions 19, and 29 to 32 assure compliance with these rules.
- j. Steam Generator (S-1141-43-9)
  - Conditions 20, 34 to 37 assure compliance with these rules.
- k. Steam Generator (S-1141-44-12, -45-12)
  - Conditions 19, 25, 30, 31, and 45 to 48 assure compliance with these rules.
- l. Steam Generator (S-1141-46-12)
  - Conditions 21, 32, and 33 assure compliance with these rules.
- m. Steam Generator (S-1141-47-12)
  - Conditions 25 to 27, and 29 assure compliance with these rules.
- n. Steam Generator (S-1141-48-12, -49-12, -50-12)
  - Conditions 23 to 26 assure compliance with these rules.
- o. Steam Generator (S-1141-51-12)

- Conditions 23 to 26 assure compliance with these rules.
- p. Steam Generator (S-1141-52-12)
  - Conditions 27, and 39 to 40 assure compliance with these rules.
- q. Steam Generator (S-1141-53-13, -55-12, -60-12)
  - Conditions 19, 25, 30, 31, and 45 to 48 assure compliance with these rules.
- r. Steam Generator (S-1141-61-12)
  - Conditions 27, 33, 34, and 40 to 42 assure compliance with these rules.
- s. Steam Generator (S-1141-67-16)
  - Conditions 31 to 34 assure compliance with these rules.
- t. Steam Generator (S-1141-70-11)
  - Conditions 18, and 28 to 31 assure compliance with these rules.
- u. Steam Generator (S-1141-368-7, -374-6, -377-7)
  - Conditions 1, 17 to 24 assure compliance with these rules.
- v. Steam Generator (S-1141-70-369-3, -370-3)
  - Conditions 26 to 29 assure compliance with these rules.
- w. Steam Generator (S-1141-371-7, -373-7, -376-7, -378-7, -380-7)
  - Conditions 1, 17 through 24 assure compliance with these rules.
- x. Steam Generator (S-1141-372-6)

- Conditions 1, and 26 to 28 assure compliance with these rules.
- y. Steam Generator (S-1141-392-4)
  - Conditions 1, 34, and 35 assure compliance with these rules.
- z. Steam Generator (S-1141-394-4)
  - Conditions 1, 27 and 32 assure compliance with these rules.
- aa. Steam Generator (S-1141-396-4)
  - Conditions 1, 30, 35, and 36 assure compliance with these rules.
- bb. Steam Generator (S-1141-402-6)
  - Conditions 1, 30, and 31 assure compliance with these rules.
- cc. Steam Generator (S-1141-431-4, -432-2)
  - Conditions 1, 24 to 26, 28, and 29 assure compliance with these rules.
- dd. Emergency Flare (S-1141-513-3)
  - Condition 7 assures compliance with this rule.
- ee. Steam Generator (S-1141-515-1)
  - Conditions 1, 19 to 21, and 23 assure compliance with these rules.
- ff. Steam Generator (S-1141-516-1)
  - Conditions 1, 11, 19 to 22, and 24 assure compliance with these rules.

- gg. Steam Generator (S-1141-517-1)
  - Conditions 1, 21, 22, 23, and 25 assure compliance with these rules.
- hh. Steam Generator (S-1141-518-1, -519-1, -521-1, -523-2)
  - Conditions 18, 26 to 28, and 30 assure compliance with these rules.
- ii. Steam Generator (S-1141-520-1)
  - Conditions 18, 25 to 28 assure compliance with these rules.
- jj. Steam Generator (S-1141-522-1)
  - Conditions 18, 25 to 26, 29 assure compliance with these rules.
- kk. Steam Generator (S-1141-524-2)
  - Conditions 1, 17, 18 to 22, and 24 assure compliance with these rules.
- ll. Steam Generator (S-1141-525-1)
  - Conditions 20, and 28 to 31 assure compliance with these rules.
- mm. Steam Generator (S-1141-526-1)
  - Conditions 18, 27 to 30 assure compliance with these rules.
- nn. Steam Generator (S-1141-527-3, -528-3)
  - Conditions 18, 27 to 29 assure compliance with these rules.
- oo. Steam Generator (S-1141-529-1)

- Conditions 1, and 17 to 21 assure compliance with these rules.
- pp. Steam Generator (S-1141-530-1, -531-1, -532-1, -533-1, -534-1)
- Conditions 18, 27 to 29, and 31 assure compliance with these rules.
- qq. Steam Generator (S-1141-535-1)
- Conditions 29 to 31 and 33 assure compliance with these rules.
- rr. Steam Generator (S-1141-554-1)
- Conditions 11 to 14 assure compliance with these rules.
- ss. Heater Treaters (S-1141-73-3, -234-3, -241-3, -242-4, -246-3, -258-3, -259-3)
- Conditions 24, 25, and 26 assure compliance with these rules.
- tt. Heater Treaters (S-1141-232-3, -244-3, -245-3, -322-2)
- Conditions 26, 27, and 28 assure compliance with these rules.
- uu. Heater Treaters (S-1141-233-2, -235-2, -236-2, -238-2, -239-2)
- Condition 18 assures compliance with these rules.
- w. Heater Treater (S-1141-240-3)
- Conditions 24, and 25 assure compliance with these rules.
- ww. Heater Treaters (S-1141-243-4, -323-2)
- Conditions 23, 24, and 25 assure compliance with these rules.

- xx. Heater Treater (S-1141-389-2)
  - Conditions 1, and 16 assure compliance with these rules.
- yy. Heater Treater (S-1141-403-5, -404-3, -405-2, -406-2, -407-2, -408-2)
  - Conditions 1, and 15 assure compliance with these rules.
- zz. Heater Treater (S-1141-466-1, -467-1, -468-1, -499-1)
  - Condition 1 assures compliance with these rules.
- aaa. Gasoline Transfer – Storage and Dispensing System (S-1141-427-2)
  - Condition 24 assures compliance with these rules.

**5. District Rule 2080, Conditional Approval**

Section 3.0 of the rule states that the APCO may issue an Authority to Construct or a Permit to Operate subject to conditions to insure the compliance of the operation of any source operation with the standards of Rule 2070 (Standard for Granting Applications), in which case the conditions shall be specified in writing.

- a. Heater Treater (S-1141-403-5, -404-3, -405-2, -406-2, -407-2, -408-2)
  - Conditions 12, and 13 of the requirements for these permit units assure compliance with this rule.
- b. Steam Generator (S-1141-516-1)
  - Condition 23 of the requirements for this permit unit assures compliance with this rule.
- c. Steam Generator (S-1141-517-1)
  - Condition 23 of the requirements for this permit unit assures compliance with this rule.

d. Steam Generator (S-1141-529-1)

- Condition 28 of the requirements for this permit unit assures compliance with this rule.

**6. District Rule 2520, Federally Mandated Operating Permits, sections 9.1, 9.4.2, and 9.5.2**

Section 9.0

Section 9.0 of the rule identifies permit content requirements for active permit units. The following permit units have been identified as “dormant”, or not currently allowed to operate, by conditions on the Permit To Operate. Since the units can not legally operate, no further evaluation of the permit content for the following units is required at this time. Permit condition 1 for each of these units assures that all Title V requirements will be addressed for each unit prior to operation.

a. Steam Generators (S-1141- 9-7, -11-9, -13-8, -18-9, -20-6, -25-10, -391-4)

- Condition 1 of the requirements for these permit units assures compliance with this rule.

Section 9.4.2

Section 9.4.2 of the rule requires that periodic monitoring be performed if none is associated with a given emission limit to assure compliance. Periodic monitoring and recordkeeping will be supported by conditions as shown on the following table.

a. Steam Generator (S-1141-19-13)

- Conditions 20 to 23, 28, 29, and 31 to 38 assure compliance with this rule.

b. Steam Generator (S-1141-26-9)

- Conditions 29 to 32, 37, and 39 to 46 assure compliance with this rule.

c. Steam Generator (S-1141-27-13)

- Conditions 24 to 27, 32, and 34 to 41 assure compliance with this rule.
- d. Steam Generator (S-1141-31-11)
- Conditions 24 to 27, 34 to 36, and 40 to 46 assure compliance with this rule.
- e. Steam Generator (S-1141-32-9)
- Conditions 23 to 26, 31, 33 to 40 assure compliance with this rule.
- f. Steam Generator (S-1141-33-13)
- Conditions 23 to 27, 32, 34, 35, 37 to 42 assure compliance with this rule.
- g. Steam Generator (S-1141-34-12)
- Conditions 22 to 27, 32 to 34, and 36 to 42 assure compliance with this rule.
- h. Steam Generator (S-1141-35-14)
- Conditions 22 to 27, 32, 34, 35, and 37 to 42 assure compliance with this rule.
- i. Steam Generator (S-1141-38-11)
- Conditions 23 to 26, 32, and 34 to 42 assure compliance with this rule.
- j. Steam Generator (S-1141-43-9)
- Conditions 30 to 33, 39, and 41 to 48 assure compliance with this rule.
- k. Steam Generator (S-1141-44-12, -45-12)
- Conditions 41 to 44, 50, and 52 to 61 assure compliance with this rule.



- l. Steam Generator (S-1141-46-12)
  - Conditions 43 to 46, 52, and 54 to 63 assure compliance with this rule.
- m. Steam Generator (S-1141-47-12)
  - Conditions 21 to 24, 30, and 32 to 39 assure compliance with this rule.
  -
- n. Steam Generator (S-1141-48-12, -49-12, -50-12)
  - Conditions 19 to 22, 28, and 30 to 37 assure compliance with this rule.
- o. Steam Generator (S-1141-51-12)
  - Conditions 19 to 22, and 27 to 37 assure compliance with this rule.
- p. Steam Generator (S-1141-52-12)
  - Conditions 35 to 38, 45, and 47 to 56 assure compliance with this rule.
- q. Steam Generator (S-1141-53-13, -55-12, -60-12)
  - Conditions 41 to 44, 50, and 52 to 61 assure compliance with this rule.
- r. Steam Generator (S-1141-61-12)
  - Conditions 35 to 38, and 44 to 55 assure compliance with this rule.
- s. Steam Generator (S-1141-67-16)
  - Conditions 27 to 30, 36, and 38 to 45 assure compliance with this rule.
- t. Steam Generator (S-1141-70-11)

- Conditions 24 to 27, 32 and 34 to 41 assure compliance with this rule.
- u. Steam Generator (S-1141-368-7, -374-6, -377-7)
  - Conditions 2, 4, 6 to 10, 14 to 16, and 26 to 35 assure compliance with this rule.
- v. Steam Generator (S-1141-369-3, -370-3)
  - Conditions 22 to 25, 30, and 32 to 39 assure compliance with this rule.
- w. Steam Generator (S-1141-371-7, -373-7, -376-7, -378-7, -380-7)
  - Conditions 2, 4, 6 to 10, 14 to 16, and 25 to 34 assure compliance with this rule.
- x. Steam Generator (S-1141-372-6)
  - Conditions 2, 5 to 11, 21 to 24, and 29 to 38 assure compliance with this rule.
- y. Steam Generator (S-1141-392-4)
  - Conditions 2, 4 to 13, 28, 30 to 33, and 36 to 46 assure compliance with this rule.
- z. Steam Generator (S-1141-394-4)
  - Conditions 2, 4 to 10, 15, 17, 28 to 31, and 34 to 40 assure compliance with this rule.
- aa. Steam Generator (S-1141-396-4)
  - Conditions 2, 4 to 13, 31, 32 to 34, and 37 to 43 assure compliance with this rule.
- bb. Steam Generator (S-1141-431-4, -432-2)
  - Conditions 2, 3, 5 to 9, 12 to 15, and 21 to 29 assure compliance with this rule.

- cc. Emergency Flare (S-1141-513-3)
  - Condition 9 assures compliance with this rule.
- dd. Steam Generator (S-1141-515-1)
  - Conditions 2, 4 to 11, 16 to 18, 24, 26, 27, and 32 to 39 assure compliance with this rule.
- ee. Steam Generator (S-1141-516-1)
  - Conditions 2, 3, 5 to 9, 15 to 18, 25 to 27, and 39 to 45 assure compliance with this rule.
- ff. Steam Generator (S-1141-517-1)
  - Conditions 2, 4 to 10, 16 to 19, 25 to 27, and 40 to 46 assure compliance with this rule.
- gg. Steam Generator (S-1141-518-1, -519-1)
  - Conditions 23 to 25, 31 to 33, and 38 to 44 assure compliance with this rule.
- hh. Steam Generator (S-1141-520-1)
  - Conditions 23, 24, 29 to 31, 33 to 39 assure compliance with this rule.
- ii. Steam Generator (S-1141-521-1)
  - Conditions 23 to 25, 31 to 33, and 35 to 41 assure compliance with this rule.
- jj. Steam Generator (S-1141-522-1)
  - Conditions 22 to 24, 30 to 32, and 35 to 41 assure compliance with this rule.
- kk. Steam Generator (S-1141-523-1)

- Conditions 23 to 25, 31 to 33, and 35 to 41 assure compliance with this rule.
- ll. Steam Generator (S-1141-524-2)
- Conditions 2, 4, 6 to 10, 14 to 16, 23, 26 to 28, 30, 31, 32, and 34 to 40 assure compliance with this rule.
- mm. Steam Generator (S-1141-525-1)
- Conditions 24 to 27, 32 to 34, and 39 to 45 assure compliance with this rule.
- nn. Steam Generator (S-1141-526-1)
- Conditions 23 to 26, and 35 to 44 assure compliance with this rule.
- oo. Steam Generator (S-1141-527-3, -528-3)
- Conditions 22 to 25, 30, 32, and 39 to 44 assure compliance with this rule.
- pp. Steam Generator (S-1141-529-1)
- Conditions 2, 3, 5 to 9, 13 to 16, and 29 to 38 assure compliance with this rule.
- qq. Steam Generator (S-1141-530-1, -531-1, -532-1, -533-1, -534-1)
- Conditions 23 to 26, 32 to 34, and 40 to 44 assure compliance with this rule.
- rr. Steam Generator (S-1141-535-1)
- Conditions 25 to 28, and 34, 36, 43 to 46 assure compliance with this rule.
- ss. Steam Generator (S-1141-554-1)
- Conditions 2, 7 to 10, 15 to 17, and 35 to 41 assure compliance with this rule.

- tt. Heater Treater (S-1141-73-3)
  - Conditions 17 to 23 and 27 to 33 assure compliance with this rule.
- uu. Heater Treater (S-1141-234-3, -241-3, -242-4, -246-3, -258-3)
  - Conditions 16 to 22 and 26 to 33 assure compliance with this rule.
- w. Heater Treater (S-1141-232-3, -240-3, -243-4, -244-3, -245-3, -322-2, -323-2)
  - Conditions 16 to 22 and 26 to 33 assure compliance with this rule.
- ww. Heater Treater (S-1141-259-3)
  - Conditions 18 to 24 and 28 to 35 assure compliance with this rule.
- xx. Heater Treater (S-1141-389-2)
  - Conditions 2, and 5 to 11 assure compliance with this rule.
- yy. Heater Treater (S-1141-403-5, -404-3, -405-2, -406-2, -407-2, -408-2)
  - Conditions 2, and 5 to 11 assure compliance with this rule.
- zz. Heater Treater (S-1141-466-1, -467-1, -468-1, -499-1)
  - Conditions 2, 5 to 11 assure compliance with this rule.
- aaa. Storage Tank (S-1141-88-2)
  - Conditions 15, and 22 assure compliance with this rule.

- bbb. Storage Tank (S-1141-89-2, -90-2, -91-2, -105-2, and -106-2)
  - Conditions 11 and 18 assure compliance with this rule.
- ccc. Storage Tanks (S-1141-111-1 through -116-1, -119-1 through -121-1, -126-1, -136-1 through -140-1, -142-1 through -145-1, -156-1 through -159-1, -161-1 through -163-1, -165-1 through -171-1, -174-1, -181-1 through -187-1, -199-1, -205-1, -212-1, -213-1, -214-1, -215-1, and -472-1)
  - Conditions 2, 3, and 4 assure compliance with this rule.
- ddd. Storage Tanks (S-1141-127-1)
  - Conditions 3 to 8, 13, and 21 assure compliance with this rule.
- eee. Storage Tanks (S-1141-128-1, -129-1, -130-1, -131-1, -132-1)
  - Conditions 4 to 10, and 15 assure compliance with this rule.
- fff. Storage Tanks (S-1141-413-2, -415-1, -416-2, -420-1, -424-1)
  - Conditions 2, 3, and 4 assure compliance with this rule.
- ggg. Storage Tank (S-1141-417-1)
  - Conditions 4 to 10, 16, 26, and 27 assure compliance with this rule.
- hhh. Storage Tanks (S-1141-418-1, -419-1, -421-1, -423-1, -429-1)
  - Conditions 4 to 10, and 16 assure compliance with this rule.
- iii. Storage Tanks (S-1141-456-1, -457-1)
  - Conditions 1 and 2 assure compliance with this rule.

- jjj. Storage Tanks (S-1141-473-3, -474-3)
  - Conditions 11 and 18 assures compliance with this rule.
- kkk. Storage Tank (S-1141-479-3)
  - Conditions 11, 15 to 21, and 27 assure compliance with this rule.
- lll. Storage Tank (S-1141-480-3, -481-3, -482-3, -483-3, -484-3, -486-3)
  - Conditions 10, 14 to 20, and 26 assure compliance with this rule.
- mmm. Storage Tank (S-1141-495-3)
  - Conditions 11, 16 and 32 to 37 assure compliance with this rule.
- nnn. Storage Tank (S-1141-496-3)
  - Conditions 9, 14, and 30 to 35 assure compliance with this rule.
- ooo. Storage Tank (S-1141-497-3, -498-3)
  - Conditions 10, 15 and 31 to 36 assure compliance with this rule.
- ppp. Thermally Enhanced Oil Recovery (TEOR) (S-1141-409-2, -410-2, -411-1, -428-2)
  - Condition 16 assures compliance with this rule.
- qqq. Thermally Enhanced Oil Recovery (TEOR) (S-1141-426-1)
  - Conditions 5 and 6 assure compliance with this rule.
- rrr. Thermally Enhanced Oil Recovery (TEOR) (S-1141-430-3)
  - Condition 15 assures compliance with this rule.

sss. Heavy Crude Oil Truck Loading Operation (S-1141-385-1, -386-1)

- Condition 9 assures compliance with this rule.

Section 9.5.2

Section 9.5.2 requires retention of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Record retention will be supported by conditions as shown on the following table.

a. Steam Generator (S-1141-19-13)

- Condition 30 assures compliance with this rule.

b. Steam Generator (S-1141-26-9)

- Condition 38 assures compliance with this rule.

c. Steam Generator (S-1141-27-13)

- Condition 33 assures compliance with this rule.

d. Steam Generator (S-1141-31-11)

- Condition 39 assures compliance with this rule.

e. Steam Generator (S-1141-32-9)

- Condition 32 assures compliance with this rule.

f. Steam Generator (S-1141-33-13)

- Condition 33 assures compliance with this rule.

g. Steam Generator (S-1141-34-12)

- Conditions 20, 21, and 33 assure compliance with this rule.

h. Steam Generator (S-1141-35-14, -38-11)



- Condition 33 assures compliance with this rule.
- i. Steam Generator (S-1141-43-9)
  - Condition 40 assures compliance with this rule.
- j. Steam Generator (S-1141-44-12, -45-12)
  - Condition 51 assures compliance with this rule.
- k. Steam Generator (S-1141-46-12)
  - Condition 53 assures compliance with this rule.
- l. Steam Generator (S-1141-47-12)
  - Condition 31 assures compliance with this rule.
- m. Steam Generator (S-1141-48-12, -49-12, -50-12, -51-12)
  - Condition 29 assures compliance with this rule.
- n. Steam Generator (S-1141-52-12, -61-12)
  - Condition 46 assures compliance with this rule.
- o. Steam Generator (S-1141-53-13, -55-12, -60-12)
  - Condition 51 assures compliance with this rule.
- p. Steam Generator (S-1141-61-12)
  - Condition 45 assures compliance with this rule.
- q. Steam Generator (S-1141-67-16)
  - Condition 37 assures compliance with this rule.
- r. Steam Generator (S-1141-70-11)
  - Condition 33 assures compliance with this rule.

- s. Heater Treater (S-1141-73-3)
  - Condition 18 assures compliance with this rule.
- t. Storage Tank (S-1141-88-2)
  - Condition 17 assures compliance with this rule.
- u. Storage Tank (S-1141-89-2)
  - Condition 13 assures compliance with this rule.
- v. Storage Tank (S-1141-90-2, -91-2, -105-2, and -106-2)
  - Condition 13 assures compliance with this rule.
- w. Storage Tank (S-1141-127-1)
  - Conditions 14 and 30 assure compliance with this rule.
- x. Storage Tank (S-1141-128-1, -129-1, -130-1, -131-1, -132-1)
  - Condition 16, and 21 assure compliance with this rule.
- y. Heater Treater (S-1141-232-3, 244-3, -245-3)
  - Condition 17 assures compliance with this rule.
- z. Heater Treater (S-1141-234-3, -241-3, -242-4)
  - Condition 17 assures compliance with this rule.
- aa. Heater Treater (S-1141-240-3, 243-4)
  - Condition 17 assures compliance with this rule.
- bb. Thermally Enhanced Oil Recovery (TEOR) (S-1141-251-7)
  - Condition 22 assures compliance with this rule.
- cc. Thermally Enhanced Oil Recovery (TEOR) (S-1141-253-9, -263-8)

- Condition 22 assures compliance with this rule.
- dd. Heater Treater (S-1141-258-3)
  - Condition 17 assures compliance with this rule.
- ee. Heater Treater (S-1141-259-3)
  - Condition 19 assures compliance with this rule.
- ff. Thermally Enhanced Oil Recovery (TEOR) (S-1141-317-2)
  - Condition 5, and 22 assure compliance with this rule.
- gg. Heater Treater (S-1141-322-2, -323-2)
  - Condition 17 assures compliance with this rule.
- hh. Diesel-Fired IC Engine (S-1141-352-2, -353-2, -354-2, -355-2)
  - Condition 13 assures compliance with this rule.
- ii. Steam Generator (S-1141-368-7)
  - Conditions 3, and 27 assure compliance with this rule.
- jj. Steam Generator (S-1141-369-3, -370-3)
  - Condition 31 assures compliance with this rule.
- kk. Steam Generator (S-1141-371-7)
  - Conditions 3, and 26 assure compliance with this rule.
- ll. Steam Generator (S-1141-372-6)
  - Conditions 3 and 30 assure compliance with this rule.
- mm. Steam Generator (S-1141-373-7, -376-7, -378-7, -380-7)
  - Conditions 3, and 26 assure compliance with this rule.

- nn. Steam Generator (S-1141-374-6, -377-7)
  - Conditions 3, and 27 assure compliance with this rule.
- oo. Heavy Crude Oil Truck Loading Operation (S-1141-385-1, -386-1)
  - Condition 10 assures compliance with this rule.
- pp. Heater Treater (S-1141-389-2)
  - Condition 3 assures compliance with this rule.
- qq. Steam Generator (S-1141-392-4)
  - Condition 37 assures compliance with this rule.
- rr. Steam Generator (S-1141-394-4)
  - Condition 16 assures compliance with this rule.
- ss. Steam Generator (S-1141-396-4)
  - Condition 19 assures compliance with this rule.
- tt. Steam Generator (S-1141-402-6)
  - Condition 15 assures compliance with this rule.
- uu. Heater Treater (S-1141-403-5, -404-5, -405-2, -406-2, -407-2, -408-2)
  - Condition 3 assures compliance with this rule.
- w. Thermally Enhanced Oil Recovery (TEOR) (S-1141-409-2, -410-2, -411-1, -426-1, -428-2, -430-3)
  - Condition 5 assures compliance with this rule.
- ww. Storage Tank (S-1141-417-1, -418-1, -419-1, -421-1, -422-1, -423-1, -429-1)
  - Condition 17 assures compliance with this rule.

- xx. Gasoline Transfer-Storage and Dispensing System (S-1141-427-2)
  - Condition 17 assures compliance with this rule.
- yy. Steam Generator (S-1141-431-4, 432-2)
  - Condition 25 assures compliance with this rule.
- zz. Heater Treater (S-1141-466-1, -467-1, -468-1, -499-1)
  - Condition 3 assures compliance with this rule.
- aaa. Storage Tank (S-1141-473-3, -474-3)
  - Condition 13 assures compliance with this rule.
- bbb. Storage Tank (S-1141-479-3)
  - Condition 28 assures compliance with this rule.
- ccc. Storage Tank (S-1141-480-3, -481-3, -482-3, -483-3, -484-3, -485-3, -486-3)
  - Condition 27 assures compliance with this rule.
- ddd. Storage Tank (S-1141-495-3)
  - Condition 21 assures compliance with this rule.
- eee. Storage Tank (S-1141-496-3)
  - Condition 19 assures compliance with this rule.
- fff. Storage Tank (S-1141-497-3, -498-3)
  - Condition 20 assures compliance with this rule.
- ggg. Emergency Flare (S-1141-513-3)
  - Condition 8 assures compliance with this rule.

- hhh. Steam Generator (S-1141-515-1)
  - Conditions 32 and 33 assure compliance with this rule.
- iii. Steam Generator (S-1141-516-1, -517-1)
  - Condition 26 assures compliance with this rule.
- jjj. Steam Generator (S-1141-518-1, -519-1, -521-1, -523-2, -527-3)
  - Condition 32 assures compliance with this rule.
- kkk. Steam Generator (S-1141-520-1)
  - Condition 30 assures compliance with this rule.
- III. Steam Generator (S-1141-522-1)
  - Condition 31 assures compliance with this rule.
- mmm. Steam Generator (S-1141-524-2)
  - Conditions 3 and 27 assure compliance with this rule.
- nnn. Steam Generator (S-1141-525-1)
  - Condition 33 assures compliance with this rule.
- ooo. Steam Generator (S-1141-526-1)
  - Condition 36 assures compliance with this rule.
- ppp. Steam Generator (S-1141-527-3, -528-3)
  - Condition 31 assures compliance with this rule.
- qqq. Steam Generator (S-1141-529-1)
  - Condition 23 assures compliance with this rule.
- rrr. Steam Generator (S-1141-530-1, -531-1, -532-1, -533-1, -534-1)

- Condition 33 assures compliance with this rule.

sss. Steam Generator (S-1141-535-1)

- Condition 35 assures compliance with this rule.

ttt. Steam Generator (S-1141-554-1)

- Condition 16 assures compliance with this rule.

## 7. District Rule 4201, Particulate Matter Concentration

EPA issued a relative stringency finding, dated August 20, 1996, stating District Rule 4201 is more stringent than SIP approved Kern County Rule 404.

Section 3.1 requires emissions to be at or below 0.1 grain of particulate matter per dry standard cubic foot of exhaust gas.

For Natural Gas Fired Units

An excess air concentration of 0% in the exhaust results in the maximum particulate matter concentration for any given emission rate. Therefore, the following calculations using an uncorrected F factor to represent worst-case emissions demonstrates that the emission of PM complies with the limits of this rule. Calculations determining the excess air concentrations for 12% CO<sub>2</sub> are shown in Attachment D.

$$\left( \frac{7.6 \text{ lb PM}}{10^6 \text{ ft}^3} \right) \left( \frac{1 \text{ scf}}{1050 \text{ Btu}} \right) \left( \frac{1 \text{ MMBtu}}{8710 \text{ dscf}} \right) \left( \frac{7000 \text{ grain}}{1 \text{ lb}} \right) = \left( \frac{0.006 \text{ grain}}{\text{dscf}} \right) < \left( \frac{0.1 \text{ grain}}{\text{dscf}} \right)$$

where:

$$\frac{8710 \text{ dscf}}{1 \text{ MMBtu}} = \frac{7.6 \text{ lb PM}}{10^6 \text{ ft}^3} = \text{sum of filterable and condensable uncontrolled the higher heating value of natural gas (AP42, Appendix A)}$$

$$\frac{1050 \text{ Btu}}{1 \text{ scf}} = \text{F factor, Fd, for natural gas at 0\% O}_2 \text{ (40CFR60. App. A. Table 19-1)}$$

$$\frac{7000 \text{ grain}}{1 \text{ lb}} = \text{conversion factor (AP-42), Appendix A}$$

- a. Steam Generator (S-1141-368-7, -371-7, -373-7, -374-6, -376-7, -377-7, -378-7, -380-7, -524-2)
  - Condition 5 of the requirements for these permit units assures compliance with this rule.
- b. Steam Generator (S-1141-372-6, -431-4, -432-2, -516-1, -529-1)
  - Condition 4 of the requirements for these permit units assures compliance with this rule.
- c. Steam Generator (S-1141-394-4, -396-4, -515-1, -517-1)
  - Condition 3 of the requirements for these permit units assures compliance with this rule.
- d. For Heater Treaters (S-1141-389-2, -403-5, -404-3, -405-2, -406-2, -407-2, -408-2, -466-1, -467-1, -468-1, -499-1)
  - Condition 4 of the requirements for these permit units assures compliance with this requirement.

For Residual Oil Fired (Including Crude or Topped Crude) Units:

Compliance with PM limits will be assured by template permit conditions that require source testing when firing on residual oil (including crude or topped-crude). The permittee is required to record daily amount of all fuels combusted, the dates on which firing on any fuel other than certified gaseous or diesel fuel has occurred, as well as the type of non-certified fuel fired. If a unit is fired on residual oil at any time during a calendar year, the operator is required to show compliance with the PM emission limit by source testing the unit during such firing and within 60 days of said firing.

- a. Steam Generator (S-1141-392-4, -396-4)



- Conditions 2, 3, and 4 of the requirements for this permit unit assure compliance with this rule.

**8. District Rule 4301, Fuel Burning Equipment**

Section 5.1 requires PM emissions to be limited to 0.1 grains per cubic foot of gas calculated to 12% carbon dioxide at dry standard conditions. Section 5.2.3 limits PM emission rates to 10 lb/hr.

An excess air concentration of 0% in the exhaust results in the maximum particulate matter concentration for any given emission rate. Therefore, the following calculations use an uncorrected F factor to represent worst-case emissions. Calculations determining the excess air concentrations for 12% CO<sub>2</sub> are shown in Attachment D.

For Natural Gas Fired Units:

The following calculations, using AP42 emission factors for natural gas, demonstrate that the emission of PM during the firing of gaseous fuels complies with the limits of these rules.

where:

$$\left( \frac{7.6 \text{ lb PM}}{10^6 \text{ ft}^3} \right) \left( \frac{1 \text{ scf}}{1050 \text{ Btu}} \right) \left( \frac{62.5 \text{ MMBtu}}{\text{hr}} \right) = \left( \frac{0.45 \text{ lb PM}}{\text{hr}} \right) < \left( \frac{10 \text{ lb PM}}{\text{hr}} \right)$$

$$\frac{8710 \text{ dscf}}{1 \text{ MMBtu}} = \begin{array}{l} \text{sum of filterable and condensable uncontrolled} \\ \text{emission factor for natural gas-fired boilers} \\ \text{(AP42, Table 1.4-2)} \end{array}$$

$$\frac{62.5 \text{ MMBtu}}{\text{hr}} = \begin{array}{l} \text{heat input of the largest steam generator in} \\ \text{the facility} \end{array}$$

$$\frac{7000 \text{ grain}}{1 \text{ lb}} = \begin{array}{l} \text{conversion factor (AP-42), Appendix A} \end{array}$$

- a. Steam Generator (S-1141-372-6, -431-4, -432-2, -516-1, -529-1)
  - Condition 4 of the requirements for these permit units assures compliance with this rule.
- b. Steam Generator (S-1141-368-7, -371-7, -373-7, -374-6, -376-7, -377-7, -378-7, -380-7, -524-2)
  - Condition 5 of the requirements for these permit units assures compliance with this rule.
- c. Steam Generator (S-1141-515-1, -517-1)
  - Condition 3 of the requirements for these permit units assures compliance with this rule.
- d. For Heater Treaters (S-1141-389-2, -403-5, -404-3, -405-2, -406-2, -407-2, -408-2, -466-1, -467-1, -468-1, -499-1)
  - Condition 4 of the requirements for these permit units assures compliance with this requirement.

For Residual Oil Fired (Including Crude or Topped Crude) Units:

Compliance with PM limits will be assured by template permit conditions that require source testing when firing on residual oil (including crude or topped-crude). The permittee is required to record daily amount of all fuels combusted, the dates on which firing on any fuel other than certified gaseous or diesel fuel has occurred, as well as the type of non-certified fuel fired. If a unit is fired on residual oil at any time during a calendar year, the operator is required to show compliance with the PM emission limit by source testing the unit during such firing and within 60 days of said firing.

a. Steam Generator (S-1141-392-4, -396-4)

- Conditions 2, 3, and 4 of the requirements for this permit unit assure compliance with this rule.

Section 5.2.1 limits the emissions of sulfur compounds to 200 pounds per hour, calculated as SO<sub>2</sub>.

a Steam Generators and Heater Treaters (S-1141-368-7, -371-7, -372-6, -373-7, -374-6, -376-7, -377-7, -378-7, -380-7, -392-4, -396-4, -402-6, -403-5, -404-3, -405-2, -407-2, -408-2, -431-2, -432-2, -466-1, -467-1, -468-1, -499-1, -515-1-516-1, -517-1, -518-1, -519-1, -524-2, -529-1)

- For permit units S-1141-368-7, -371-7, -373-7, -374-6, -376-7, -377-7, -378-7, -380-7, -402-6, -524-2, condition 6 assures compliance with this rule.
- For permit units S-1141-372-6, -389-2, -392-4, -396-4, -403-5, -404-3, -405-2, -407-2, -408-2, -431-4, -432-2, -466-1, -467-1, -468-1, -499-1, -518-1, -519-1, -529-1, condition 5 assures compliance with this rule.
- For permit units S-1141-515-1, -516-1, -517-1, condition 4 assures compliance with this rule.

**9. District Rule 4305, Boilers, Steam Generators, and Process Heaters**

This rule is a non-SIP approved but sections 5.1, 5.4, 6.2, and 6.3 show compliance with federally enforceable requirements, and therefore are federally enforceable through Title V permit.

a. Steam Generators (S-1141-19-13)

- Conditions 19 to 23, 27 to 31, and 33 to 36 of the requirements for this permit unit assure compliance with this rule.
- b. Steam Generators (S-1141-26-9)
- Conditions 18, 27, 29 to 32, 36 to 39, and 41 to 44 of the requirements for these permit units assure compliance with this rule.
- c. Steam Generators (S-1141-27-13)
- Conditions 19, 24 to 27, 31 to 34, and 36 to 39 of the requirements for these permit units assure compliance with this rule.
- d. Steam Generators (S-1141-31-11)
- Conditions 17, 23 to 27, 31, 34 to 36, and 42 to 45 of the requirements for this permit unit assure compliance with this rule.
- e. Steam Generators (S-1141-32-9)
- Conditions 18, 23 to 26, 30 to 33, and 35 to 38 of the requirements for these permit units assure compliance with this rule.
- f. Steam Generators (S-1141-33-13)
- Conditions 19, 24 to 27, 31 to 34, and 37 to 40 of the requirements for these permit units assure compliance with this rule.
- g. Steam Generator (S-1141-34-12)
- Conditions 19, 24 to 27, 31 to 34, and 36 to 39 of the requirements for this permit unit assure compliance with this rule.
- h. Steam Generator (S-1141-35-14)

- Conditions 19, 24 to 27, 31 to 34, and 37 to 40 of the requirements for this permit unit assure compliance with this rule.
- i. Steam Generator (S-1141-38-11)
  - Conditions 23 to 26, 30 to 34, and 37 to 40 of the requirements for this permit unit assure compliance with this rule.
- j. Steam Generator (S-1141-43-9)
  - Conditions 19, 28, 30 to 33, 37, 39 to 41, and 44 to 47 of the requirements for this permit unit assure compliance with this rule.
- k. Steam Generator (S-1141-44-12)
  - Conditions 39, 41 to 44, 48, 50 to 52 and 55 to 58 of the requirements for this permit unit assure compliance with this rule.
- l. Steam Generators (S-1141-45-12)
  - Conditions 18, 39, 41 to 44, 48, 50 to 52, and 55 to 58 of the requirements for this permit unit assure compliance with this rule.
- m. Steam Generator (S-1141-46-12)
  - Conditions 41, 43 to 46, 50, 52 to 54, and 57 to 60 of the requirements for this permit unit assure compliance with this rule.
- n. Steam Generator (S-1141-47-12)
  - Conditions 19, 21 to 24, 29 to 32, and 35 to 38 of the requirements for this permit unit assure compliance with this rule.
- o. Steam Generators (S-1141-48-12, -49-12, -50-12, -51-12)

- Conditions 18 to 22, 26 to 30, and 33 to 36 of the requirements for these permit units assure compliance with this rule.
- p. Steam Generator (S-1141-52-12)
- Conditions 18, 32, 35 to 38, 42, 45, 46, 47, and 50 to 53 of the requirements for this permit unit assure compliance with this rule.
- q. Steam Generators (S-1141-53-13, -55-12, -60-12)
- Conditions 18, 39, 41 to 44, 48, 50 to 52, and 55 to 58 of the requirements for these permit units assure compliance with this rule.
- r. Steam Generator (S-1141-61-12)
- Conditions 18, 35 to 38, 42, 44 to 46, and 49 to 52 of the requirements for this permit unit assure compliance with this rule.
- s. Steam Generator (S-1141-67-16)
- Conditions 17, 25, 27 to 30, 34, 36 to 38, and 41 to 44 of the requirements for this permit unit assure compliance with this rule.
- t. Steam Generators (S-1141-70-11)
- Conditions 19, 24 to 27, 31 to 34, and 37 to 40 of the requirements for this permit unit assure compliance with this rule.
- u. Heater Treater (S-1141-73-3)
- Conditions 16 to 23, and 27 to 31 of the requirements for this permit unit assure compliance with this rule.
- v. Heater Treaters (S-1141-232-3, -234-3, -241-3, -242-4, -243-4, -244-3, -245-3, -258-3, -322-3, -323-2)

- Conditions 15 to 22, and 26 to 30 of the requirements for these permit units assure compliance with this rule.
- w. Heater Treater (S-1141-240-3)
- Conditions 15 to 22, 26, and 28 to 31 of the requirements for this permit unit assure compliance with this rule.
- x. Heater Treater (S-1141-246-3)
- Conditions 15 to 23, and 27 to 31 of the requirements for this permit unit assure compliance with this rule.
- y. Heater Treater (S-1141-259-3)
- Conditions 16 to 24, and 28 to 32 of the requirements for this permit unit assure compliance with this rule.
- z. Steam Generators (S-1141-368-7, -374-6, -377-7)
- Conditions 10, 13 to 16, 24 to 28, and 31 to 34 of the requirements for these permit units assure compliance with this rule.
- aa. Steam Generators (S-1141-369-3, -370-3)
- Conditions 15, 17, 22 to 25, 29 to 32, 34, and 35 to 38 of the requirements for these permit units assure compliance with this rule.
- bb. Steam Generators (S-1141-371-7, -373-7, -376-7, -378-7, -380-7)
- Conditions 10, 13 to 16, 24 to 27, and 30 to 33 of the requirements for these permit units assure compliance with this rule.
- cc. Steam Generator (S-1141-372-6)
- Conditions 9, 14, 21 to 24, 28 to 31, and 34 to 37 of the requirements for this permit unit assure compliance with this rule.
- dd. Steam Generator (S-1141-392-4)

- Conditions 10, 14, 16, 17, 30 to 33, 35 to 38, and 41 to 45 of the requirements for this permit unit assure compliance with this rule.
- ee. Steam Generator (S-1141-394-4)
- Conditions 12, 28 to 31, and 36 to 39 of the requirements for this permit unit assure compliance with this rule.
- ff. Steam Generator (S-1141-396-4)
- Conditions 10, 15, 18, 32 to 35, and 38 to 45 of the requirements for this permit unit assure compliance with this rule.
- gg. Steam Generator (S-1141-402-6)
- Conditions 10, 11, 26 to 29, and 34 to 37 of the requirements for this permit unit assure compliance with this rule.
- hh. Steam Generators (S-1141-431-4, -432-2)
- Conditions 9 to 15, 20 to 25, 27 and 28 of the requirements for these permit units assure compliance with this rule.
- ii. Steam Generator (S-1141-515-1)
- Conditions 8, 12, 15 to 18, 23, 26, 27, and 33 to 35 of the requirements for this permit unit assure compliance with this rule.
- jj. Steam Generator (S-1141-516-1)
- Conditions 9, 10, 15 to 18, 24 to 27, and 40 to 43 of the requirements for this permit unit assure compliance with this rule.
- kk. Steam Generator (S-1141-517-1)



- Conditions 8, 11, 16 to 19, 24 to 27, and 41 to 44 of the requirements for this permit unit assure compliance with this rule.

ll. Steam Generator (S-1141-518-1, -519-1)

- Conditions 17, 22 to 25, 30 to 33, and 39 to 42 of the requirements for this permit unit assure compliance with this rule.

mm. Steam Generator (S-1141-520-1)

- Conditions 17, 21 to 24, 28 to 31, and 34 to 37 of the requirements for this permit unit assure compliance with this rule.

nn. Steam Generator (S-1141-521-1)

- Conditions 17, 22 to 25, 30 to 33, and 36 to 39 of the requirements for this permit unit assure compliance with this rule.

oo. Steam Generator (S-1141-522-1)

- Conditions 17, 21 to 24, 29 to 32, and 36 to 39 of the requirements for this permit unit assure compliance with this rule.

pp. Steam Generator (S-1141-523-2)

- Conditions 17, 22 to 25, 30 to 33, and 36 to 39 of the requirements for this permit unit assure compliance with this rule.

qq. Steam Generator (S-1141-524-2)

- Conditions 10, 13 to 16, 24 to 28, 30 to 32, and 35 to 38 of the requirements for this permit unit assure compliance with this rule.

rr. Steam Generator (S-1141-525-1)

- Conditions 18, 23 to 27, 31 to 34, and 40 to 43 of the requirements for this permit unit assure compliance with this rule.
- ss. Steam Generator (S-1141-526-1)
  - Conditions 17, 21, 23 to 26, 30, 35 to 37, and 39 to 42 of the requirements for this permit unit assure compliance with this rule.
- tt. Steam Generator (S-1141-527-3, -528-3)
  - Conditions 17, 21, 23 to 26, and 38 to 41 of the requirements for this permit unit assure compliance with this rule.
- uu. Steam Generator (S-1141-529-1)
  - Conditions 9, 11, 13 to 16, 21, 29 to 31, and 33 to 36 of the requirements for this permit unit assure compliance with this rule.
- w. Steam Generator (S-1141-530-1, -531-1, -532-1, -533-1, -534-1)
  - Conditions 9, 17, 21, 23 to 26, 31 to 34, 41, and 42 of the requirements for this permit unit assure compliance with this rule.
- ww. Steam Generator (S-1141-535-1)
  - Conditions 19, 23, 25 to 28, 33 to 36, 43, and 44 of the requirements for this permit unit assure compliance with this rule.
- xx. Steam Generator (S-1141-554-1)
  - Conditions 6 to 10, and 14 to 17 of the requirements for this permit unit assure compliance with this rule.

**10. District Rule 4401, Steam Enhanced Crude Oil Production Well Vents**

District Rule 4401 (amended January 15, 1998) is a renumbering of the requirements of SIP approved District Rule 465.1.

Section 5.0 sets forth requirements for limiting the emissions of Volatile Organic Compounds (VOCs). This section lists emission control requirements as well as work practice standards.

- a. TEOR operation including 29 steam drive wells (S-1141-317-2); TEOR operation including 95 Wells (S-1141-409-2); TEOR operation including 34 steam drive wells and 3 cyclic (S-1141-410-2); TEOR operation including 90 steam drive wells (S-1141-411-1); 1512 cyclically steam enhanced Wells with closed casing vents (S-1141-426-1); TEOR operation including 148 steam drive wells (S-1141-428-2); TEOR operation including 58 steam drive and 20 cyclic wells (S-1141-430-3)
  - Conditions 6 through 12 of the requirements for permits units S-1141-317-2, -409-2, -410-2, -411-1, and -428-2, and by conditions 6 through 15 and 19 of the requirements for permit unit S-1141-430-3 assure compliance with this requirement.
  - Conditions 1 to 4 of the requirements for permit units S-1141-426-1 assure compliance with this rule.

Section 6.0 sets forth requirements for testing and recordkeeping. This section also allows the APCO to waive certain control systems from the requirements of section 6.2.1. Section 6.2.1 requires annual source testing to show control efficiency compliance. This waiver applies to control systems consisting of fuel burning equipment, an internal combustion engine, smokeless flares, or systems which do not have a VOC destruction device (specifically, if VOC collected is reinjected underground).

- Conditions 4 and 13 through 16 of the requirements for permit units S-1141-317-2, -409-2, -410-2, -411-1, and -428-2, and by conditions 4 and 12 through 15 of the requirements for permit unit S-1141-430-3 assure compliance with this section.

The basis of the waiver for smokeless open flares is that technology does not currently exist for source testing these controls. However, typically these devices have 99% or greater control efficiency.

The basis of the waiver for control systems, which re-inject VOC underground, is that these systems are assumed to have 100% control. This VOC disposal method does not use an emission destruction device and there is no need to conduct a source test.

The basis of the waiver for control systems consisting of fuel burning equipment (primarily steam generators) is that these units have greater than 99% control efficiency for VOC, as demonstrated by the following calculations:

#### STEAM GENERATORS:

$$\frac{5.5 \frac{lb \cdot VOC}{10^6 \cdot cf}}{\frac{1 \cdot lb}{23.8 \cdot cf}} = 0.00013 \frac{lb \cdot VOC}{lb \cdot gas} = 0.013 \%$$

where:

$$5.5 \frac{lb \cdot VOC}{10^6 \cdot cf} = \text{VOC emission factor from natural gas-fired boilers (AP-42, Table 1.4-2)}$$
$$\frac{1 \cdot lb}{23.8 cf} = \text{density of natural gas, (AP-42, Appendix A)}$$

The preceding calculations demonstrate that the control efficiency for VOC emissions is greater than 99% by almost two orders of magnitude for steam generators. Therefore, source tests for VOC control effectiveness are clearly unnecessary.

Control systems which have been waived from the source test requirements of District Rule 6.2.1 are still required to demonstrate compliance with sections 5.1 and 5.2 of the rule for 99% control of collection and control efficiency. There are no general conditions addressing compliance with these sections for such equipment. Consequently, a one-time demonstration of collection efficiency using a mass balance and source specific data will be necessary for such sources. In the Title V application (except by the use of templates) the source must also demonstrate compliance with the requirement that collection and control system have 99% control efficiency.

**11. District Rule 4405, Oxides of Nitrogen Emissions from Existing Steam Generators used in Thermally Enhanced Oil Recovery-Central and Western Kern County Fields**

District Rule 4405 has been submitted to the EPA to replace Kern County Rule 425. The following comparison table indicates that the District Rule is more stringent than the County Rule.

**Table 4 – Comparison of District Rule 4405 to Kern County Rule 425**

Requirements	District Rule 4405	Kern County Rule 425
NOx Emission Limits: lb-NOx/MMBtu		
For large steam generators operated by small producers	Oil Fired - 0.35 Gas Fired - 0.14	Oil Fired - 0.35
For large steam generators operated by producers other than small producers	Oil Fired - 0.20 Gas Fired - 0.14	Oil Fired - 0.30
For all small steam generators	Oil Fired - 0.38 Gas Fired - 0.18	Oil Fired - 0.40

For small (greater than 15 MMBtu/hr but less than 35 MMBtu/hr) gas fired steam generators, NOx is limited to 0.18 lb NOx/MMBtu and oil fired steam generators is limited to 0.38 lb NOx/MMBtu. The following small steam generators are limited by the following conditions in the permit.

- a. For permit unit S-1141-392-4, conditions 16 and 17 of the requirements for this permit unit limits NOx (as NO<sub>2</sub>) to 0.036 lb MMBtu/hr for gas fired and 0.380 lb MMBtu/hr for oil fired. Therefore compliance to this rule is assured.
- b. For permit unit S-1141-394-4, condition 12 of the requirement for this permit unit limits NOx (as NO<sub>2</sub>) to 0.036 lb MMBtu/hr for gas fired and therefore assures compliance with this rule.
- c. For permit unit S-1141-396-4, condition 14 of the requirements for this permit unit limits NOx (as NO<sub>2</sub>) to 0.036 lb MMBtu/hr for gas fired. Therefore compliance to this rule is assured.
- d. For permit unit S-1141-402-6, condition 11 of the requirements for this permit unit limits NOx (as NO<sub>2</sub>) to 0.036

lb MMBtu/hr for gas fired. Therefore compliance to this rule is assured.

**12. District Rule 4406, Sulfur Compounds from Oil-field Steam Generators for Kern County**

District Rule 4406 has been submitted to the EPA to replace Kern County Rule 424. The following comparison table indicates that the District Rule is as stringent as the County Rule.

**Table 4 – Comparison of District Rule 4406 to Kern County Rule 424**

Requirements	District Rule 4406	Kern County Rule 424
Limits sulfur emissions to 0.11 lb sulfur per million BTUs of heat input	✓	✓
Averaging: Operator may satisfy this emission limit by demonstrating the total emissions of sulfur compounds from all steam generators located at the stationary source, do not exceed the total emissions of sulfur compounds from these generators which would result if all such units were operating in compliance with this emission limit.	✓	✓
Small Producer Exemption: Exemption shall only apply to existing steam generators with a heat input rating of less than 35 MMBtu/hour owned or operated by a small producer, up to a total heat input of 165 MMBtu/hour for any one small producer.	✓	✓

Section 6.0 states that the operator of two or more existing steam generators subject to this rule may satisfy the requirement limiting sulfur emissions to 0.11 lb sulfur per MMBtu by demonstrating that the total emissions of sulfur compounds from all of its existing steam generators which are located within the same stationary source do not exceed the total emissions of sulfur compounds from its existing steam generators which would result if each of its existing steam generators within the same stationary source which are subject to this rule were operating in compliance with this rule.

- a. Steam Generators (S-1141-26-9)
  - Conditions 20, 21, and 26 of the requirements for this permit unit assure compliance with this rule.
- b. Steam Generators (S-1141-31-11)

- Conditions 22, 32, and 33 of the requirements for this permit unit assure compliance with this rule.
- c. Steam Generator (S-1141-32-9)
  - Condition 20 of the requirements for this permit unit assures compliance with this rule.
- d. Steam Generator (S-1141-33-13, -34-12, -35-14)
  - Condition 21 of the requirements for these permit units assures compliance with this rule.
- e. Steam Generator (S-1141-43-9)
  - Conditions 21, 22, and 27 of the requirements for this permit unit assure compliance with this rule.
- f. Steam Generator (S-1141-45-12)
  - Conditions 32, 33, and 38 of the requirements for this permit unit assure compliance with this rule.
- g. Steam Generator (S-1141-46-12)
  - Conditions 34, 35, and 40 of the requirements for this permit unit assure compliance with this rule.
- h. Steam Generator (S-1141-53-13, -55-12, -60-12)
  - Conditions 32, 33, and 38 of the requirements for these permit units assure compliance with this rule.
- i. Steam Generator (S-1141-61-12)
  - Condition 32 of the requirements for this permit unit assures compliance with this rule.
- j. Steam Generator (S-1141-70-11)
  - Condition 21 of the requirements for this permit unit assures compliance with this rule.

- k. Steam Generator (S-1141-369-3, -370-3, -372-6)
  - Condition 21 of the requirements for this permit unit assures compliance with this rule.
- l. Steam Generator (S-1141-372-6)
  - Condition 20 of the requirements for this permit unit assures compliance with this rule.
- m. Steam Generator (S-1141-392-4)
  - Condition 28 of the requirements for these permit units assures compliance with this rule.
- n. Steam Generator (S-1141-394-4)
  - Condition 26 of the requirements for this permit unit assures compliance with this rule.
- o. Steam Generator (S-1141-396-4)
  - Condition 29 of the requirements for this permit unit assure compliance with this rule.
- p. Steam Generator (S-1141-515-1)
  - Condition 25 of the requirements for this permit unit assures compliance with this rule.
- q. Steam Generator (S-1141-516-1)
  - Conditions 28 and 29 of the requirements for this permit unit assure compliance with this rule.
- r. Steam Generator (S-1141-517-1)
  - Conditions 28 and 29 of the requirements for this permit unit assure compliance with this rule.
- s. Steam Generator (S-1141-518-1, -519-1)



- Conditions 19, 34, and 35 of the requirements for this permit unit assure compliance with this rule.
- t. Steam Generator (S-1141-520-1)
  - Conditions 20 and 32 of the requirements for this permit unit assure compliance with this rule.
- u. Steam Generator (S-1141-521-1)
  - Conditions 19 and 34 of the requirements for this permit unit assure compliance with this rule.
- v. Steam Generator (S-1141-522-1)
  - Conditions 19 and 33 of the requirements for this permit unit assure compliance with this rule.
- w. Steam Generator (S-1141-523-2)
  - Conditions 19 and 34 of the requirements for this permit unit assure compliance with this rule.
- x. Steam Generator (S-1141-525-1)
  - Conditions 21, 34, and 35 of the requirements for this permit unit assure compliance with this rule.
- y. Steam Generator (S-1141-526-1)
  - Conditions 20, 31, and 32 of the requirements for this permit unit assure compliance with this rule.
- z. Steam Generator (S-1141-530-1, -531-1, -532-1, -533-1, -534-1)
  - Conditions 35 and 36 of the requirements for this permit unit assure compliance with this rule.
- aa. Steam Generator (S-1141-535-1)
  - Conditions 37 and 38 of the requirements for this permit unit assure compliance with this rule.

**13. District Rule 4621, Transfer of Gasoline into Stationary Storage Containers, Delivery Vessels, and Bulk Plants, except section 5.2.2.**

Section 5.1.1 prohibits the transfer of gasoline from any delivery vessel into any stationary storage container unless such container is equipped with a permanent submerged fill pipe and a certified Phase I vapor recovery system and operated according to the manufacturers specifications.

a. Gasoline Storage and Dispensing System (S-1141-427-2)

- Conditions 3, and 4 of the requirements for this permit unit assure compliance with this section.

Section 5.2.1 prohibits the operation of a gasoline delivery vessel unless valid State of California decals, as required by section 41962 of the Health and Safety Code, and which attest to the vapor integrity of the tank are displayed.

a. Gasoline Storage and Dispensing System (S-1141-427-2)

- Conditions 5 and 6 of the requirements for this permit unit assures compliance with this section.

**14. District 4622, Gasoline Transfer into Motor Vehicle Fuel Tanks**

Sections 5.1, 5.2, and 5.3 prohibits the transfer of gasoline from a stationary storage container subject to the provisions of section 5.1 of District Rule 4621 into a motor vehicle fuel tank unless the dispensing unit is equipped with and has in operation a certified Phase II vapor recovery system. Any gasoline dispensing system subject to this rule shall comply with the provisions of this rule at the time of installation. Any gasoline dispensing facility permitted to operate a certified Phase II vapor recovery system shall maintain the system and all of its components in good repair in order that such system can continue to comply with the certification recovery efficiency.

a. Gasoline Storage and Dispensing System (S-1141-427-2)

- Condition 1 through 7, 10 through 13, 15, and 16 of the requirements for this permit unit assure compliance with this section.

Section 6.2 requires that the vapor recovery system be tested to determine proper installation and function of the entire system, including the infrastructure plumbing and aboveground equipment, not less than once every five years. Section 6.3 identifies the applicable test procedures.

a. Gasoline Storage and Dispensing System (S-1141-427-2)

- Condition 8 and 9 of the requirements for this permit unit assure compliance with this section.

**15. District Rule 4623, Storage of Organic Liquids**

This rule requires that all tanks with a storage capacity greater than 19,800 gallons, storing organic liquids with a true vapor pressure greater than or equal to 1.5 psia, have either a floating roof or vapor recovery system to control volatile organic compound (VOC) emissions. Units covered by the following sections control VOC emissions by using a vapor recovery system.

Section 2.0 states that this rule is only applicable to equipment used to store organic liquids, including crude oil and petroleum distillates, with a true vapor pressure of greater than 1.5 psia.

- a. Fixed Roof Tanks (S-1141-88-2, -89-2, -90-2, -91-2, -105-2, -106-2, -111-1, -112-1, -113-1, -114-1, -115-1, -116-1, -119-1, -120-1, -121-1, -126-1, -136-1, -137-1, -139-1, -140-1, -142-1, -143-1, -144-1, -145-1, -156-1, -157-1, -158-1, -159-1, -161-1, -162-1, -163-1, -164-1, -165-1, -166-1, -167-1, -168-1, -169-1, -170-1, -171-1, -174-1, -181-1, -182-1, -183-1, -184-1, -185-1, -186-1, -187-1, -199-1, -205-1, -212-1, -213-1, -214-1, -215-1, -413-2, -415-1, -416-2, -420-1, -424-1, -473-3, -474-3)
- Condition 1 of the requirements for these permit units assures compliance with this rule.
- b. 250 Barrel Drain Tank (S-1141-472-1)

The liquids stored in this tank has a true vapor pressure less than 1.5 psia, therefore it is exempt from the requirements of this rule.

- Condition 1 of the requirements for these permit units assures compliance with this rule.

Section 5.3.1 requires that any fixed roof tank with a storage capacity of 19,800 gallons or larger used to store any organic liquid, light crude oil or petroleum distillate with a true vapor pressure greater than 1.5 psia be equipped with a vapor loss prevention system capable of collecting all VOCs. These units also are required to contain a system for processing and for return to liquid storage or disposal of VOCs, so as to prevent their emission to the atmosphere at an efficiency of at least 95 percent by weight.

- a. Fixed Roof Tanks With Vapor Control Equipment (S-1141-128-1, -129-1, -130-1, -131-1, -132-1, -417-1, -418-1, -419-1, -421-1, -422-1, -423-1, -429-1)
  - Condition 1 of the requirements for these permit units assures compliance with this rule.
- b. Fixed Roof Tanks With Vapor Control Equipment (S-1141-479-3)
  - Condition 12 of the requirements for these permit units assures compliance with this rule.
- c. Fixed Roof Tanks With Vapor Control Equipment (S-1141-480-3, -481-3, -482-3, -483-3, -484-3, -486-3)
  - Condition 11 of the requirements for these permit units assures compliance with this rule.

Section 5.3.2 requires that any tank gauging or sampling device on a tank vented to the vapor recovery system be equipped with a gas-tight cover. This cover shall be closed at all times except during gauging or sampling.

- a. Fixed Roof Tanks with Vapor Control Equipment (S-1141-127-1, -128-1, -129-1, -130-1, -131-1, -132-1, -417-1, -418-1, -419-1, -421-1, -422-1, -423-1, -429-1)

- Condition 2 of the requirements for these permit units assures compliance with this rule.
- b. Fixed Roof Tanks with Vapor Control Equipment (S-1141-479-3)
  - Conditions 3, and 13 of the requirements for these permit units assure compliance with this rule.
- c. Fixed Roof Tanks with Vapor Control Equipment (S-1141-480-3, -481-3, -482-3, -483-3, -484-3, -486-3)
  - Conditions 3, and 12 of the requirements for these permit units assures compliance with this rule.

Section 5.3.3 requires that all piping, valves and fittings be constructed and maintained in a gas tight condition.

- a. Fixed Roof Tanks with Vapor Control Equipment (S-1141-127-1, -128-1, -129-1, -130-1, -131-1, -132-1, -417-1, -418-1, -419-1, -421-1, -422-1, -423-1, -429-1)
  - Condition 3 of the requirements for these permit units assures compliance with this rule.
  - Condition 4 to 10 of the requirements for these permit units assure compliance with monitoring and recordkeeping requirements of this rule.
- b. Fixed Roof Tanks with Vapor Control Equipment (S-1141-479-3)
  - Conditions 2 and 14 of the requirements for this permit unit assure compliance with this rule.
- c. Fixed Roof Tanks with Vapor Control Equipment (S-1141-480-3, -481-3, -482-3, -483-3, -484-3, -486-3)
  - Conditions 2 and 13 of the requirements for this permit unit assure compliance with this rule.
- d. Heavy Crude Oil Truck Loading Operation (S-1141-385-1, -386-1)

- Condition 2 of the requirements for these permit units assure compliance with this rule

Additional monitoring and recordkeeping requirements are given in the following conditions:

- Conditions 9 through 14 and 30 of the requirements for permit unit S-1141-127-1.
- Conditions 11 through 14 and 21 of the requirements for permit units S-1141-128-1 through -132-1.
- Conditions 11 through 15 of the requirements for permit units S-1141-417-1, -418-1, -419-1, -421-1, -422-1, -423-1, and -429-1.

**16. 40 CFR Part 52 Subpart A Prevention of Significant Deterioration of Air Quality**

**a. Permit SJ 78-16**

USEPA PSD permit SJ 78-16 was issued/amended by Region IX on July 16, 1999. Conditions from this permit were addressed to define how permit terms should be incorporated into Title V permits S-1141-32-9, -33-13, -34-12, -35-14, -43-9, and -67-16.

Conditions from this permit were also addressed to define how permit terms should be incorporated into the Title V permit S-1141-554-1, which is a functionally identical replacement for permit S-1141-39.

Permit units S-1141-36, S-1141-37, S-1141-40, S-1141-41, and S-1141-42 have been canceled and will not be addressed in this evaluation.

**I. Notification of Commencement of Construction and Startup.**

- This condition has been included as condition 41 for permit unit S-1141-32-9.
- This condition has been included as condition 43 for permit unit S-1141-33-13.
- This condition has been included as condition 43 for permit unit S-1141-34-12.

- This condition has been included as condition 43 for permit unit S-1141-35-14.
- This condition has been included as condition 49 for permit unit S-1141-43-9.
- This condition has been included as condition 46 for permit unit S-1141-67-16.
- This condition has been included as condition 42 for permit unit S-1141-554-1.

## II. Facility Operation

- This condition has been included as condition 42 for permit unit S-1141-32-9.
- This condition has been included as condition 44 for permit unit S-1141-33-13.
- This condition has been included as condition 44 for permit unit S-1141-34-12.
- This condition has been included as condition 44 for permit unit S-1141-35-14.
- This condition has been included as condition 50 for permit unit S-1141-43-9.
- This condition has been included as condition 47 for permit unit S-1141-67-16.
- This condition has been included as condition 43 for permit unit S-1141-554-1.

## III. Malfunction

- This condition has been included as condition 43 for permit unit S-1141-32-9.
- This condition has been included as condition 45 for permit unit S-1141-33-13.
- This condition has been included as condition 45 for permit unit S-1141-34-12.
- This condition has been included as condition 45 for permit unit S-1141-35-14.
- This condition has been included as condition 51 for permit unit S-1141-43-9.
- This condition has been included as condition 48 for permit unit S-1141-67-16.
- This condition has been included as condition 44 for permit unit S-1141-554-1.

#### IV. Right to Entry

- This condition has been included as condition 44 for permit unit S-1141-32-9.
- This condition has been included as condition 46 for permit unit S-1141-33-13.
- This condition has been included as condition 46 for permit unit S-1141-34-12.
- This condition has been included as condition 46 for permit unit S-1141-35-14.
- This condition has been included as condition 52 for permit unit S-1141-43-9.
- This condition has been included as condition 49 for permit unit S-1141-67-16.
- This condition has been included as condition 45 for permit unit S-1141-554-1.

#### V. Transfer of Ownership

- This condition has been included as condition 45 for permit unit S-1141-32-9.
- This condition has been included as condition 47 for permit unit S-1141-33-13.
- This condition has been included as condition 47 for permit unit S-1141-34-12.
- This condition has been included as condition 47 for permit unit S-1141-35-14.
- This condition has been included as condition 53 for permit unit S-1141-43-9.
- This condition has been included as condition 50 for permit unit S-1141-67-16.
- This condition has been included as condition 46 for permit unit S-1141-554-1.

#### VI. Severability

- This condition has been included as condition 46 for permit unit S-1141-32-9.
- This condition has been included as condition 48 for permit unit S-1141-33-13.
- This condition has been included as condition 48 for permit unit S-1141-34-12.



- This condition has been included as condition 48 for permit unit S-1141-35-14.
- This condition has been included as condition 54 for permit unit S-1141-43-9.
- This condition has been included as condition 51 for permit unit S-1141-67-16.
- This condition has been included as condition 47 for permit unit S-1141-554-1.

#### VII. Other Applicable Regulations

- This condition has been included as condition 47 for permit unit S-1141-32-9.
- This condition has been included as condition 49 for permit unit S-1141-33-13.
- This condition has been included as condition 49 for permit unit S-1141-34-12.
- This condition has been included as condition 49 for permit unit S-1141-35-14.
- This condition has been included as condition 55 for permit unit S-1141-43-9.
- This condition has been included as condition 52 for permit unit S-1141-67-16.
- This condition has been included as condition 48 for permit unit S-1141-554-1.

#### VIII. Paperwork Reduction Act

- This condition has been included as condition 48 for permit unit S-1141-32-9.
- This condition has been included as condition 50 for permit unit S-1141-33-13.
- This condition has been included as condition 50 for permit unit S-1141-34-12.
- This condition has been included as condition 50 for permit unit S-1141-35-14.
- This condition has been included as condition 56 for permit unit S-1141-43-9.
- This condition has been included as condition 53 for permit unit S-1141-67-16.
- This condition has been included as condition 49 for permit unit S-1141-554-1.

## IX. Special Conditions

### A. Certification

- This condition has been included as condition 49 for permit unit S-1141-32-9.
- This condition has been included as condition 51 for permit unit S-1141-33-13.
- This condition has been included as condition 51 for permit unit S-1141-34-12.
- This condition has been included as condition 51 for permit unit S-1141-35-14.
- This condition has been included as condition 57 for permit unit S-1141-43-9.
- This condition has been included as condition 54 for permit unit S-1141-67-16.
- This condition has been included as condition 50 for permit unit S-1141-554-1.

### B. Air Pollution Control Equipment/Operation

- This condition has been included as condition 50 for permit unit S-1141-32-9.
- This condition has been included as condition 52 for permit unit S-1141-33-13.
- This condition has been included as condition 52 for permit unit S-1141-34-12.
- This condition has been included as condition 52 for permit unit S-1141-35-14.
- This condition has been included as condition 58 for permit unit S-1141-43-9.
- This condition has been included as condition 55 for permit unit S-1141-67-16.
- This condition has been included as condition 51 for permit unit S-1141-554-1.

### C. Emission Limits

- This condition has been included as condition 51 for permit unit S-1141-32-9.
- This condition has been included as condition 53 for permit unit S-1141-33-13.

- This condition has been included as condition 53 for permit unit S-1141-34-12.
- This condition has been included as condition 53 for permit unit S-1141-35-14.
- This condition has been included as condition 59 for permit unit S-1141-43-9.
- This condition has been included as condition 56 for permit unit S-1141-67-16.
- This condition has been included as condition 52 for permit unit S-1141-554-1.

#### D. Source Tests

- This condition has been included as conditions 52 through 58 for permit unit S-1141-32-9.
- This condition has been included as conditions 54 through 60 for permit unit S-1141-33-13.
- This condition has been included as conditions 54 through 60 for permit unit S-1141-34-12.
- This condition has been included as conditions 54 through 60 for permit unit S-1141-35-14.
- This condition has been included as conditions 60 through 66 for permit unit S-1141-43-9.
- This condition has been included as conditions 57 through 63 for permit unit S-1141-67-16.
- This condition has been included as conditions 53 through 59 for permit unit S-1141-554-1.

#### E. Recordkeeping and Reporting

- This condition has been included as conditions 59 through 61 for permit unit S-1141-32-9.
- This condition has been included as conditions 61 through 63 for permit unit S-1141-33-13.
- This condition has been included as conditions 61 through 63 for permit unit S-1141-34-12.
- This condition has been included as conditions 61 through 63 for permit unit S-1141-35-14.
- This condition has been included as conditions 67 through 69 for permit unit S-1141-43-9.
- This condition has been included as conditions 64 through 66 for permit unit S-1141-67-16.

- This condition has been included as conditions 60 through 62 for permit unit S-1141-554-1.

F. Agency Notification

- This condition has been included as condition 62 for permit unit S-1141-32-9.
- This condition has been included as condition 64 for permit unit S-1141-33-13.
- This condition has been included as condition 64 for permit unit S-1141-34-12.
- This condition has been included as condition 64 for permit unit S-1141-35-14.
- This condition has been included as condition 70 for permit unit S-1141-43-9.
- This condition has been included as condition 67 for permit unit S-1141-67-16.
- This condition has been included as condition 63 for permit unit S-1141-554-1.

b. Permit SJ 78-17

USEPA PSD permit SJ 78-17 was issued/amended by Region IX on July 16, 1999. Conditions from this permit were addressed to define how permit terms should be incorporated into Title V permits S-1141-38-11, -44-12, -45-12, -46-12, -47-12, -48-12, -49-12, -50-12, -51-12, -52-12, -53-13, -55-12, -60-12.

Conditions from this permit were addressed to define how permit terms should be incorporated into Title V permits S-1141-519-1, -521-1, -523-2, -530-1, -531-1, -532-1, -533-1, -534-1, and -535-1, which are functionally identical replacements for S-1141-64-4, -65-4, -66-3, -57-4, -58-4, 62-4, -59-4, -56-4, and -54-4 respectively.

I. Notification of Commencement of Construction and Startup

- This condition has been included as condition 42 for permit unit S-1141-38-11.
- This condition has been included as condition 62 for permit unit S-1141-44-12.

- This condition has been included as condition 62 for permit unit S-1141-45-12.
- This condition has been included as condition 64 for permit unit S-1141-46-12.
- This condition has been included as condition 40 for permit unit S-1141-47-12.
- This condition has been included as condition 38 for permit unit S-1141-48-12.
- This condition has been included as condition 38 for permit unit S-1141-49-12.
- This condition has been included as condition 38 for permit unit S-1141-50-12.
- This condition has been included as condition 38 for permit unit S-1141-51-12.
- This condition has been included as condition 57 for permit unit S-1141-52-12.
- This condition has been included as condition 62 for permit unit S-1141-53-13.
- This condition has been included as condition 62 for permit unit S-1141-55-12.
- This condition has been included as condition 62 for permit unit S-1141-60-12.
- This condition has been included as condition 45 for permit unit S-1141-519-1.
- This condition has been included as condition 42 for permit unit S-1141-521-1.
- This condition has been included as condition 42 for permit unit S-1141-523-2.
- This condition has been included as condition 44 for permit unit S-1141-530-1.
- This condition has been included as condition 44 for permit unit S-1141-531-1.
- This condition has been included as condition 44 for permit unit S-1141-532-1.
- This condition has been included as condition 44 for permit unit S-1141-533-1.
- This condition has been included as condition 44 for permit unit S-1141-534-1.
- This condition has been included as condition 46 for permit unit S-1141-535-1.

## II. Facility Operation

- This condition has been included as condition 43 for permit unit S-1141-38-11.
- This condition has been included as condition 63 for permit unit S-1141-44-12.
- This condition has been included as condition 63 for permit unit S-1141-45-12.
- This condition has been included as condition 65 for permit unit S-1141-46-12.
- This condition has been included as condition 41 for permit unit S-1141-47-12.
- This condition has been included as condition 39 for permit unit S-1141-48-12.
- This condition has been included as condition 39 for permit unit S-1141-49-12.
- This condition has been included as condition 39 for permit unit S-1141-50-12.
- This condition has been included as condition 39 for permit unit S-1141-51-12.
- This condition has been included as condition 57 for permit unit S-1141-52-12.
- This condition has been included as condition 63 for permit unit S-1141-53-13.
- This condition has been included as condition 63 for permit unit S-1141-55-12.
- This condition has been included as condition 63 for permit unit S-1141-60-12.
- This condition has been included as condition 46 for permit unit S-1141-519-1.
- This condition has been included as condition 43 for permit unit S-1141-521-1.
- This condition has been included as condition 43 for permit unit S-1141-523-2.
- This condition has been included as condition 45 for permit unit S-1141-530-1.
- This condition has been included as condition 45 for permit unit S-1141-531-1.
- This condition has been included as condition 45 for permit unit S-1141-532-1.
- This condition has been included as condition 45 for permit unit S-1141-533-1.
- This condition has been included as condition 45 for permit unit S-1141-534-1.

- This condition has been included as condition 47 for permit unit S-1141-535-1.

### III. Malfunction

- This condition has been included as condition 44 for permit unit S-1141-38-11.
- This condition has been included as condition 64 for permit unit S-1141-44-12.
- This condition has been included as condition 64 for permit unit S-1141-45-12.
- This condition has been included as condition 66 for permit unit S-1141-46-12.
- This condition has been included as condition 42 for permit unit S-1141-47-12.
- This condition has been included as condition 40 for permit unit S-1141-48-12.
- This condition has been included as condition 40 for permit unit S-1141-49-12.
- This condition has been included as condition 40 for permit unit S-1141-50-12.
- This condition has been included as condition 40 for permit unit S-1141-51-12.
- This condition has been included as condition 58 for permit unit S-1141-52-12.
- This condition has been included as condition 64 for permit unit S-1141-53-13.
- This condition has been included as condition 64 for permit unit S-1141-55-12.
- This condition has been included as condition 64 for permit unit S-1141-60-12.
- This condition has been included as condition 47 for permit unit S-1141-519-1.
- This condition has been included as condition 44 for permit unit S-1141-521-1.
- This condition has been included as condition 44 for permit unit S-1141-523-2.
- This condition has been included as condition 46 for permit unit S-1141-530-1.
- This condition has been included as condition 46 for permit unit S-1141-531-1.
- This condition has been included as condition 46 for permit unit S-1141-532-1.

- This condition has been included as condition 46 for permit unit S-1141-533-1.
- This condition has been included as condition 46 for permit unit S-1141-534-1.
- This condition has been included as condition 48 for permit unit S-1141-535-1.

#### IV. Right to Entry

- This condition has been included as condition 45 for permit unit S-1141-38-11.
- This condition has been included as condition 65 for permit unit S-1141-44-12.
- This condition has been included as condition 65 for permit unit S-1141-45-12.
- This condition has been included as condition 67 for permit unit S-1141-46-12.
- This condition has been included as condition 43 for permit unit S-1141-47-12.
- This condition has been included as condition 41 for permit unit S-1141-48-12.
- This condition has been included as condition 41 for permit unit S-1141-49-12.
- This condition has been included as condition 41 for permit unit S-1141-50-12.
- This condition has been included as condition 41 for permit unit S-1141-51-12.
- This condition has been included as condition 59 for permit unit S-1141-52-12.
- This condition has been included as condition 65 for permit unit S-1141-53-13.
- This condition has been included as condition 65 for permit unit S-1141-55-12.
- This condition has been included as condition 65 for permit unit S-1141-60-12.
- This condition has been included as condition 48 for permit unit S-1141-519-1.
- This condition has been included as condition 45 for permit unit S-1141-521-1.
- This condition has been included as condition 45 for permit unit S-1141-523-2.
- This condition has been included as condition 47 for permit unit S-1141-530-1.



- This condition has been included as condition 47 for permit unit S-1141-531-1.
- This condition has been included as condition 47 for permit unit S-1141-532-1.
- This condition has been included as condition 47 for permit unit S-1141-533-1.
- This condition has been included as condition 47 for permit unit S-1141-534-1.
- This condition has been included as condition 49 for permit unit S-1141-535-1.

#### V. Transfer of Ownership

- This condition has been included as condition 46 for permit unit S-1141-38-11.
- This condition has been included as condition 66 for permit unit S-1141-44-12.
- This condition has been included as condition 66 for permit unit S-1141-45-12.
- This condition has been included as condition 68 for permit unit S-1141-46-12.
- This condition has been included as condition 44 for permit unit S-1141-47-12.
- This condition has been included as condition 42 for permit unit S-1141-48-12.
- This condition has been included as condition 42 for permit unit S-1141-49-12.
- This condition has been included as condition 42 for permit unit S-1141-50-12.
- This condition has been included as condition 42 for permit unit S-1141-51-12.
- This condition has been included as condition 60 for permit unit S-1141-52-12.
- This condition has been included as condition 66 for permit unit S-1141-53-13.
- This condition has been included as condition 66 for permit unit S-1141-55-12.
- This condition has been included as condition 66 for permit unit S-1141-60-12.
- This condition has been included as condition 49 for permit unit S-1141-519-1.
- This condition has been included as condition 46 for permit unit S-1141-521-1.

- This condition has been included as condition 46 for permit unit S-1141-523-2.
- This condition has been included as condition 48 for permit unit S-1141-530-1.
- This condition has been included as condition 48 for permit unit S-1141-531-1.
- This condition has been included as condition 48 for permit unit S-1141-532-1.
- This condition has been included as condition 48 for permit unit S-1141-533-1.
- This condition has been included as condition 48 for permit unit S-1141-534-1.
- This condition has been included as condition 50 for permit unit S-1141-535-1.

#### VI. Severability

- This condition has been included as condition 47 for permit unit S-1141-38-11.
- This condition has been included as condition 67 for permit unit S-1141-44-12.
- This condition has been included as condition 67 for permit unit S-1141-45-12.
- This condition has been included as condition 69 for permit unit S-1141-46-12.
- This condition has been included as condition 45 for permit unit S-1141-47-12.
- This condition has been included as condition 43 for permit unit S-1141-48-12.
- This condition has been included as condition 43 for permit unit S-1141-49-12.
- This condition has been included as condition 43 for permit unit S-1141-50-12.
- This condition has been included as condition 43 for permit unit S-1141-51-12.
- This condition has been included as condition 61 for permit unit S-1141-52-12.
- This condition has been included as condition 67 for permit unit S-1141-53-13.
- This condition has been included as condition 67 for permit unit S-1141-55-12.
- This condition has been included as condition 67 for permit unit S-1141-60-12.

- This condition has been included as condition 50 for permit unit S-1141-519-1.
- This condition has been included as condition 47 for permit unit S-1141-521-1.
- This condition has been included as condition 47 for permit unit S-1141-523-2.
- This condition has been included as condition 49 for permit unit S-1141-530-1.
- This condition has been included as condition 49 for permit unit S-1141-531-1.
- This condition has been included as condition 49 for permit unit S-1141-532-1.
- This condition has been included as condition 49 for permit unit S-1141-533-1.
- This condition has been included as condition 49 for permit unit S-1141-534-1.
- This condition has been included as condition 51 for permit unit S-1141-535-1.

#### VII. Other Applicable Regulations

- This condition has been included as condition 48 for permit unit S-1141-38-11.
- This condition has been included as condition 68 for permit unit S-1141-44-12.
- This condition has been included as condition 68 for permit unit S-1141-45-12.
- This condition has been included as condition 70 for permit unit S-1141-46-12.
- This condition has been included as condition 46 for permit unit S-1141-47-12.
- This condition has been included as condition 44 for permit unit S-1141-48-12.
- This condition has been included as condition 44 for permit unit S-1141-49-12.
- This condition has been included as condition 44 for permit unit S-1141-50-12.
- This condition has been included as condition 44 for permit unit S-1141-51-12.
- This condition has been included as condition 62 for permit unit S-1141-52-12.
- This condition has been included as condition 68 for permit unit S-1141-53-13.

- This condition has been included as condition 68 for permit unit S-1141-55-12.
- This condition has been included as condition 68 for permit unit S-1141-60-12.
- This condition has been included as condition 51 for permit unit S-1141-519-1.
- This condition has been included as condition 48 for permit unit S-1141-521-1.
- This condition has been included as condition 48 for permit unit S-1141-523-2.
- This condition has been included as condition 50 for permit unit S-1141-530-1.
- This condition has been included as condition 50 for permit unit S-1141-531-1.
- This condition has been included as condition 50 for permit unit S-1141-532-1.
- This condition has been included as condition 50 for permit unit S-1141-533-1.
- This condition has been included as condition 50 for permit unit S-1141-534-1.
- This condition has been included as condition 52 for permit unit S-1141-535-1.

#### VIII. Paperwork Reduction Act

- This condition has been included as condition 49 for permit unit S-1141-38-11.
- This condition has been included as condition 69 for permit unit S-1141-44-12.
- This condition has been included as condition 69 for permit unit S-1141-45-12.
- This condition has been included as condition 71 for permit unit S-1141-46-12.
- This condition has been included as condition 47 for permit unit S-1141-47-12.
- This condition has been included as condition 45 for permit unit S-1141-48-12.
- This condition has been included as condition 45 for permit unit S-1141-49-12.
- This condition has been included as condition 45 for permit unit S-1141-50-12.
- This condition has been included as condition 45 for permit unit S-1141-51-12.

- This condition has been included as condition 63 for permit unit S-1141-52-12.
- This condition has been included as condition 69 for permit unit S-1141-53-13.
- This condition has been included as condition 69 for permit unit S-1141-55-12.
- This condition has been included as condition 69 for permit unit S-1141-60-12.
- This condition has been included as condition 52 for permit unit S-1141-519-1.
- This condition has been included as condition 49 for permit unit S-1141-521-1.
- This condition has been included as condition 49 for permit unit S-1141-523-2.
- This condition has been included as condition 51 for permit unit S-1141-530-1.
- This condition has been included as condition 51 for permit unit S-1141-531-1.
- This condition has been included as condition 51 for permit unit S-1141-532-1.
- This condition has been included as condition 51 for permit unit S-1141-533-1.
- This condition has been included as condition 51 for permit unit S-1141-534-1.
- This condition has been included as condition 53 for permit unit S-1141-535-1.

## IX. Special Conditions

### A. Certification

- This condition has been included as condition 50 for permit unit S-1141-38-11.
- This condition has been included as condition 70 for permit unit S-1141-44-12.
- This condition has been included as condition 70 for permit unit S-1141-45-12.
- This condition has been included as condition 72 for permit unit S-1141-46-12.
- This condition has been included as condition 48 for permit unit S-1141-47-12.
- This condition has been included as condition 46 for permit unit S-1141-48-12.

- This condition has been included as condition 46 for permit unit S-1141-49-12.
- This condition has been included as condition 46 for permit unit S-1141-50-12.
- This condition has been included as condition 46 for permit unit S-1141-51-12.
- This condition has been included as condition 64 for permit unit S-1141-52-12.
- This condition has been included as condition 70 for permit unit S-1141-53-13.
- This condition has been included as condition 70 for permit unit S-1141-55-12.
- This condition has been included as condition 70 for permit unit S-1141-60-12.
- This condition has been included as condition 53 for permit unit S-1141-519-1.
- This condition has been included as condition 50 for permit unit S-1141-521-1.
- This condition has been included as condition 50 for permit unit S-1141-523-2.
- This condition has been included as condition 52 for permit unit S-1141-530-1.
- This condition has been included as condition 52 for permit unit S-1141-531-1.
- This condition has been included as condition 52 for permit unit S-1141-532-1.
- This condition has been included as condition 52 for permit unit S-1141-533-1.
- This condition has been included as condition 52 for permit unit S-1141-534-1.
- This condition has been included as condition 54 for permit unit S-1141-535-1.

#### B. Air Pollution Control Equipment/Operation

- This condition has been included as condition 51 for permit unit S-1141-38-11.
- This condition has been included as condition 71 for permit unit S-1141-44-12.
- This condition has been included as condition 71 for permit unit S-1141-45-12.
- This condition has been included as condition 73 for permit unit S-1141-46-12.

- This condition has been included as condition 49 for permit unit S-1141-47-12.
- This condition has been included as condition 47 for permit unit S-1141-48-12.
- This condition has been included as condition 47 for permit unit S-1141-49-12.
- This condition has been included as condition 47 for permit unit S-1141-50-12.
- This condition has been included as condition 47 for permit unit S-1141-51-12.
- This condition has been included as condition 65 for permit unit S-1141-52-12.
- This condition has been included as condition 71 for permit unit S-1141-53-13.
- This condition has been included as condition 71 for permit unit S-1141-55-12.
- This condition has been included as condition 71 for permit unit S-1141-60-12.
- This condition has been included as condition 54 for permit unit S-1141-519-1.
- This condition has been included as condition 51 for permit unit S-1141-521-1.
- This condition has been included as condition 51 for permit unit S-1141-523-2.
- This condition has been included as condition 53 for permit unit S-1141-530-1.
- This condition has been included as condition 53 for permit unit S-1141-531-1.
- This condition has been included as condition 53 for permit unit S-1141-532-1.
- This condition has been included as condition 53 for permit unit S-1141-533-1.
- This condition has been included as condition 53 for permit unit S-1141-534-1.
- This condition has been included as condition 55 for permit unit S-1141-535-1.

#### C. Emission Limits

- This condition has been included as condition 52 for permit unit S-1141-38-11.
- This condition has been included as condition 72 for permit unit S-1141-44-12.

- This condition has been included as condition 72 for permit unit S-1141-45-12.
- This condition has been included as condition 74 for permit unit S-1141-46-12.
- This condition has been included as condition 50 for permit unit S-1141-47-12.
- This condition has been included as condition 48 for permit unit S-1141-48-12.
- This condition has been included as condition 48 for permit unit S-1141-49-12.
- This condition has been included as condition 48 for permit unit S-1141-50-12.
- This condition has been included as condition 48 for permit unit S-1141-51-12.
- This condition has been included as condition 66 for permit unit S-1141-52-12.
- This condition has been included as condition 72 for permit unit S-1141-53-13.
- This condition has been included as condition 72 for permit unit S-1141-55-12.
- This condition has been included as condition 72 for permit unit S-1141-60-12.
- This condition has been included as condition 55 for permit unit S-1141-519-1.
- This condition has been included as condition 52 for permit unit S-1141-521-1.
- This condition has been included as condition 52 for permit unit S-1141-523-2.
- This condition has been included as condition 54 for permit unit S-1141-530-1.
- This condition has been included as condition 54 for permit unit S-1141-531-1.
- This condition has been included as condition 54 for permit unit S-1141-532-1.
- This condition has been included as condition 54 for permit unit S-1141-533-1.
- This condition has been included as condition 54 for permit unit S-1141-534-1.
- This condition has been included as condition 56 for permit unit S-1141-535-1.

#### D. Source Tests



- These conditions have been included as conditions 53 through 59 for permit unit S-1141-38-11.
- These conditions have been included as conditions 73 through 79 for permit unit S-1141-44-12.
- These conditions have been included as conditions 73 through 79 for permit unit S-1141-45-12.
- These conditions have been included as conditions 75 through 81 for permit unit S-1141-46-12.
- These conditions have been included as conditions 51 through 57 for permit unit S-1141-47-12.
- These conditions have been included as conditions 49 through 55 for permit unit S-1141-48-12.
- These conditions have been included as conditions 49 through 55 for permit unit S-1141-49-12.
- These conditions have been included as conditions 49 through 55 for permit unit S-1141-50-12.
- These conditions have been included as conditions 49 through 55 for permit unit S-1141-51-12.
- These conditions have been included as conditions 68 through 74 for permit unit S-1141-52-12.
- These conditions have been included as conditions 73 through 79 for permit unit S-1141-53-1.
- These conditions have been included as conditions 73 through 79 for permit unit S-1141-55-12.
- These conditions have been included as conditions 73 through 79 for permit unit S-1141-60-12.
- These conditions have been included as condition 56 through 62 for permit unit S-1141-519-1.
- These conditions have been included as condition 53 through 59 for permit unit S-1141-521-1.
- These conditions have been included as condition 53 through 59 for permit unit S-1141-523-2.
- These conditions have been included as condition 55 through 61 for permit unit S-1141-530-1.
- These conditions have been included as condition 55 through 61 for permit unit S-1141-531-1.
- These conditions have been included as condition 55 through 61 for permit unit S-1141-532-1.
- These conditions have been included as condition 55 through 61 for permit unit S-1141-533-1.
- These conditions have been included as condition 55 through 61 for permit unit S-1141-534-1.

- These conditions have been included as condition 57 through 63 for permit unit S-1141-535-1.

#### E. Recordkeeping and Reporting

- These conditions have been included as conditions 60 through 62 for permit unit S-1141-38-11.
- These conditions have been included as conditions 80 through 82 for permit unit S-1141-44-12.
- These conditions have been as conditions 80 through 82 for permit unit S-1141-45-12.
- These conditions have been included as conditions 82 through 84 for permit unit S-1141-46-12.
- These conditions have been included as conditions 58 through 60 for permit unit S-1141-47-12.
- These conditions have been included as conditions 56 through 58 for permit unit S-1141-48-12.
- These conditions have been included as conditions 56 through 58 for permit unit S-1141-49-12.
- These conditions have been included as conditions 56 through 58 for permit unit S-1141-50-12.
- These conditions have been included as conditions 56 through 58 for permit unit S-1141-51-12.
- These conditions have been included as conditions 75 through 77 for permit unit S-1141-52-12.
- These conditions have been included as conditions 80 through 82 for permit unit S-1141-53-1.
- These conditions have been included as conditions 80 through 82 for permit unit S-1141-55-12.
- These conditions have been included as conditions 80 through 82 for permit unit S-1141-60-12.
- These conditions have been included as conditions 63 through 65 for permit unit S-1141-519-1.
- These conditions have been included as conditions 60 through 62 for permit unit S-1141-521-1.
- These conditions have been included as conditions 60 through 62 for permit unit S-1141-523-2.
- These conditions have been included as conditions 62 through 64 for permit unit S-1141-530-1.
- These conditions have been included as conditions 62 through 64 for permit unit S-1141-531-1.
- These conditions have been included as conditions 62 through 64 for permit unit S-1141-532-1.

- These conditions have been included as conditions 62 through 64 for permit unit S-1141-533-1.
- These conditions have been included as conditions 62 through 64 for permit unit S-1141-534-1.
- These conditions have been included as conditions 64 through 66 for permit unit S-1141-535-1.

F. Agency Notification

- This condition has been included as condition 63 for permit unit S-1141-38-11.
- This condition has been included as condition 83 for permit unit S-1141-44-12.
- This condition has been included as condition 83 for permit unit S-1141-45-12.
- This condition has been included as condition 85 for permit unit S-1141-46-12.
- This condition has been included as condition 61 for permit unit S-1141-47-12.
- This condition has been included as condition 59 for permit unit S-1141-48-12.
- This condition has been included as condition 59 for permit unit S-1141-49-12.
- This condition has been included as condition 59 for permit unit S-1141-50-12.
- This condition has been included as condition 59 for permit unit S-1141-51-12.
- This condition has been included as condition 78 for permit unit S-1141-52-12.
- This condition has been included as condition 83 for permit unit S-1141-53-13.
- This condition has been included as condition 83 for permit unit S-1141-55-12.
- This condition has been included as condition 83 for permit unit S-1141-60-12.
- This condition has been included as condition 66 for permit unit S-1141-519-1.
- This condition has been included as condition 63 for permit unit S-1141-521-1.
- This condition has been included as condition 63 for permit unit S-1141-523-2.
- This condition has been included as condition 65 for permit unit S-1141-530-1.

- This condition has been included as condition 65 for permit unit S-1141-531-1.
- This condition has been included as condition 65 for permit unit S-1141-532-1.
- This condition has been included as condition 65 for permit unit S-1141-533-1.
- This condition has been included as condition 65 for permit unit S-1141-534-1.
- This condition has been included as condition 67 for permit unit S-1141-535-1.

**17. 40 CFR Part 60, Subpart K, Standards of Performance for Storage Vessels for Petroleum Liquids**

This subpart does not apply to storage vessels for petroleum or condensate stored, processed, and/or treated at a drilling and production facility prior to custody transfer.

All storage tanks used in this facility are for petroleum or condensate stored, processed, and/or treated at a drilling and production facility prior to custody transfer and therefore exempt from the requirements of this subpart.

**18. 40 CFR Part 60, Subpart Ka, Standards of Performance for Storage Vessels for Petroleum Liquids**

This subpart applies to storage vessels for petroleum liquids which has a storage capacity greater than 40,000 gallons and for which construction is commenced after May 18, 1978 and prior to July 23, 1984. In addition, this subpart does not apply to storage vessels with a capacity of less than 420,000 gallons used for petroleum or condensate stored, processed, or treated prior to custody transfer.

- a. Except for storage tanks S-1141-214-1, -215-1, -387-1, and -388-1, the storage tanks in this facility have capacities of less than 420,000 gallons and are used for petroleum or condensate stored, processed, or treated prior to custody transfer and therefore exempt from this subpart.
- b. Storage Tanks S-1141-214-1, and -215-1 have capacities greater than 420,000 gallons but were constructed before May 18, 1978 and therefore exempt from this subpart.

- c. Storage Tanks S-1141-387-1, and -388-1 have capacities greater than 420,000 gallons but were constructed after July 23, 1984 and therefore exempt from this subpart.

**19. 40 CFR Part 60, Subpart Kb, Standards of Performance for Storage Vessels for Petroleum Liquids**

This subpart applies to storage vessels with a capacity greater than or equal to 40 m<sup>3</sup> (10,567 gallons) that is used to store volatile organic liquids for which construction, reconstruction, or modification is commenced after July 23, 1984. This subpart does not apply to storage vessels with a capacity greater than or equal to 151 m<sup>3</sup> (39,890 gallons) storing a liquid with a maximum true vapor pressure less than 3.5 kPa (0.5 psia) or with a capacity greater than or equal to 75 m<sup>3</sup> (19,800 gallons) but less than 151 m<sup>3</sup> (39,890 gallons) storing a liquid with a maximum true vapor pressure less than 15.0 kPa (2.2 psia). In addition this subpart applies to storage tanks with capacities of greater than 420,000 gallons used for petroleum or condensate stored, processed, or treated prior to custody transfer.

- a. Storage Tanks S-1141-214-1, and -215-1 have capacities greater than 420,000 gallons but were constructed before May 18, 1978 and therefore exempt from this subpart.
- b. Storage Tanks (S-1141-387-1, -388-1)
  - Conditions 1 through 10 of the requirements for these permit units assure compliance with this rule.
- c. Fixed Roof Tanks with Vapor Control Equipment (S-1141-495-3)
  - Conditions 14 to 20, 22 to 28, 30 and 31 of the requirements for these permit units assure compliance with this rule.
- d. Fixed Roof Tanks with Vapor Control Equipment (S-1141-496-3)
  - Conditions 12 to 16, 18, 20 to 29, 30 and 31 of the requirements for these permit units assure compliance with this rule.

- e. Fixed Roof Tanks with Vapor Control Equipment (S-1141-497-3, -498-3)
  - Conditions 13 to 17, 19, 21 to 27, 29 and 30 of the requirements for these permit units assure compliance with this rule.

**20. 40 CFR 63, Subpart HH - National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities**

These requirements provide national emission standards for hazardous air pollutants from oil and natural gas production facilities. Effective June 17, 2002, if the facility is a major air toxic source subject to the requirements of 40 CFR 63 subpart HH, the facility shall comply with all applicable requirements of 40 CFR 63 subpart HH.

This facility is exempt from the requirements of this subpart, pursuant to section 40 CFR 63.760(e)(1). This facility exclusively handles black oil as defined in 40 CFR 63.761 (Hydrocarbon liquid with an initial producing gas-to-oil ratio less than .31 cubic meters per liter and an API gravity less than 40 degrees).

## **X. PERMIT SHIELD**

A permit shield legally protects a facility from enforcement of the shielded regulations when a source is in compliance with the terms and conditions of the Title V permit. Compliance with the terms and conditions of the Operating Permit is considered compliance with all applicable requirements upon which those conditions are based, including those that have been subsumed.

### **A. Requirements Addressed by Model General Permit Templates**

By using the model general permit template(s) listed in Section IV of this evaluation, the applicant has requested that a permit shield be issued for requirements addressed in the template(s). The basis for each permit shield is discussed in the Permit Shield section of each template.

#### **1. SJV-UM-0-1, Facility Wide Umbrella General Permit Template**

- The permit shield is included as conditions 38, and 39 of the facility wide requirements.

2. Model General Permit Template, SJV-BSG-13-0, Boilers, Steam Generators and Process Heaters
  - For Steam Generators S-1141-19-13, -26-9, -27-13, -31-11, -32-9, -33-13, -34-12, -35-14, -38-11, -39-10, -43-9, -44-12, -45-12, -46-12, -47-12, -48-12, -49-12, -50-12, -51-12, -52-12, -53-13, -55-12, -60-12, -61-12, -67-16, -70-11, -518-1, -519-1, -520-1, -521-1, -522-1, -523-2, -525-1, -526-1, -527-3, -528-3, -530-1, -531-1, -532-1, -533-1, -534-1 the permit shield is included as conditions 13 to 16 of the requirements for these permit units.
3. Model General Permit Template, SJV-BSG-17-0, Boilers, Steam Generators and Process Heaters
  - For Heater Treaters S-1141-73-3, -232-3, -233-2, -234-3, -235-2, -236-2, -238-2, -239-2, -240-3, -241-3, -242-4, -243-4, -244-3, -245-3, -246-3, -258-3, -259-3, -322-2, -323-2, the permit shield is included as conditions 12 to 14 of the requirements for these permit units.
4. Model General Permit Template, SJV-BSG-19-0, Boilers, Steam Generators, and Process Heaters
  - For Steam Generators S-1141-369-3, and -370-3, the permit shield is included as conditions 11 to 14 of the requirements for these permit units.
6. Model General Permit Template, SJV-IC-1-0, Series 1 Internal Combustion Engine
  - For Diesel-Fired IC Engine, S-1141-352-2, -353-2, -354-2, and -355-2, the permit shield is included as conditions 10 and 11 of the requirements for these permit units.
7. Model General Permit Template, SJV-WV-1-1, Series 1 Well Vents
  - For Thermally Enhanced Oil Recovery (TEOR), S-1141-250-8, -251-7, -253-9, -263-8, -320-4, -331-9, -365-3, -366-3, and -367-3 the permit shield is included as conditions 17 to 19 of the requirements for these permit units.

The applicant is requesting a permit shield for each of the requirements listed below:

A. 40 CFR Part 60, Subpart K, Ka, and Kb

Subparts K, Ka, and Kb does not apply to petroleum storage vessels with a capacity of less than 420,000 gallons used for petroleum or condensate stored, processed, or treated prior to custody transfer.

The storage tanks in this facility excluding permit units S-1141-214-1, -215-1, -387-1, -388-1, -495-3, -496-3, -497-3, and -498-3 have capacities of less than 420,000 gallons and qualify for this exemption. Therefore a permit shield is being granted in the requirements for the following permit units.

- S-1141-88-2, as condition 31.
- S-1141-89-2, -90-2, -91-2, as condition 22.
- S-1141-105-2, , -106-2, -111-1, -112-1, -113-1, -114-1, -115-1, -116-1, -119-1, -120-1, -121-1, -126-1, -136-1, -137-1, -139-1, -140-1, -142-1, -143-1, -144-1, -145-1, -156-1, -157-1, -158-1, -159-1, -161-1, -162-1, -163-1, -168-1, -169-1, -170-1, -171-1, -174-1, -181-1, -182-1, -183-1, -184-1, -185-1, -186-1, -187-1, -199-1, -205-1, -212-1, -213-1 as condition 5.

Subpart K does not apply to storage vessels used for petroleum or condensate stored, processed, and/or treated at a drilling and production facility prior to custody transfer. Subpart Ka applies to storage vessels with a capacity of greater 40,000 gallons and for which construction is commenced after May 18, 1978 and prior to July 23, 1984. Subpart Kb applies to storage vessels with capacities greater than or equal to 10,567 gallons constructed, reconstructed, or modified after July 23, 1984. Permit units S-1141-214-1, and -215-1 have capacities greater than 420,000 gallons but were constructed prior to May 18, 1978 and are exempt from subpart K, Ka, and Kb. Therefore a permit shield is being granted in the requirements for permit units S-1141-214-1, and -215-1 as condition 5.

Permit Units S-1141-387-1, and -388-1 have capacities greater than 420,000 gallons but were constructed after July 23, 1984 which exempts these storage tanks from subparts K and Ka only. Therefore a permit shield for subparts K and Ka is being granted in the requirements for permit units S-1141-387-1, and -388-1 as condition 11.



## **XI. PERMIT CONDITIONS**

See permit conditions beginning on the following page.

**ATTACHMENT A**  
**DETAILED FACILITY PRINTOUT**

## **ATTACHMENT B**

### **INSIGNIFICANT ACTIVITIES OR EQUIPMENT**

The following exempt equipment was identified by the applicant on TVFORM-003, Insignificant Activities.

<b>Exemption Category</b>	<b>Rule 2020 Citation</b>	
Structure or incinerator associated with a structure designed as a dwelling for 4 families or less.	4.2.3	✓
Use of less than 2 gal/day of graphic arts materials.	5.4	✓
Natural gas or LPG-fired boilers or other indirect heat transfer units of 5 MMBtu/hr or less.	5.1.1	✓
Piston-type internal combustion engine with maximum continuous rating of 50 braking horsepower (bhp) or less.	5.1.2	✓
Gas turbine engines with maximum heat input rating of 3 MMBtu/hr or less.	5.1.3	✓
Space heating equipment other than boilers.	5.1.4	✓
Locomotives, airplanes, and watercraft used to transport passengers or freight.	5.2	✓
Cooling towers with a circulation rate less than 10,000 gal/min.	5.3	✓
Equipment at retail establishments used to prepare food for human consumption.	5.5.1	
Ovens at bakeries with total daily production less than 1,000 pounds and exempt by Section 5.1.1.	5.5.2	
Equipment used exclusively for extruding or compression molding of rubber or plastics, where no plasticizer or blowing agent is used.	5.6	✓
Containers used to store clean produced water.	5.7.1	✓
Containers $\leq 100$ bbl used to store oil with specific gravity $\geq 0.8762$ .	5.7.2	✓
Containers $\leq 100$ bbl installed prior to 6/1/89 used to store oil with specific gravity $\geq 0.8762$ .	5.7.3	✓
Brazing, soldering, or welding equipment.	5.10.1	✓
Fugitive emissions sources associated with exempt equipment.	5.10.3	✓
Equipment used to compress natural gas.	5.10.2	✓
Containers with a capacity $\leq 250$ gallons used to store organic material where the actual storage temperature $< 50$ F.	5.7.4	✓
Containers used to store unheated organic material with an initial boiling point $\geq 302$ F.	5.7.5	✓
Containers used to store fuel oils or non-air-blown asphalt with specific gravity $\geq .9042$ .	5.7.6	✓
Containers used to store petroleum distillates used as motor fuel with specific gravity $\geq 0.8251$ .	5.7.7	✓
Containers used to store refined lubricating oils.	5.7.8	✓

<b>Exemption Category</b>	<b><i>Rule 2020 Citation</i></b>	
Unvented pressure vessels used exclusively to store liquefied gases or associated with exempt equipment.	5.7.9 or 5.10.4	✓
Portable tanks used exclusively to store produced fluids for ≤ six months.	5.7.10	✓
Mobile transport tanks on vehicles for delivery of VOCs.	5.7.11	✓
Loading racks used for the transfer of less than 4,000 gal/day of unheated organic material with initial boiling point ≥ 302 F or of fuel oil with specific gravity ≥ 0.8251.	5.8.1.1	✓
Loading racks used for the transfer of asphalt, crude or residual oil stored in exempt tanks, or crude oil with specific gravity ≥ 0.8762.	5.8.1.2	✓
Equipment used to apply architectural coatings.	5.9.1	✓
Equipment used exclusively for the transfer of refined lubricating oil.	5.8.2	✓
Unheated, non-conveyorized degreasers < 10 ft <sup>2</sup> open area; using solvents with initial boiling point ≥ 248 F; and < 25 gal/yr evaporative losses.	5.9.2	✓
Pits and Ponds as defined in Rule 1020.	5.10.6	✓
Non-structural repairs & maintenance to permitted equipment.	4.2.6	✓
Emissions less than 2 lb/day from units not included above.	4.2.1	✓

**ATTACHMENT C**  
**PREVIOUS PTOs**

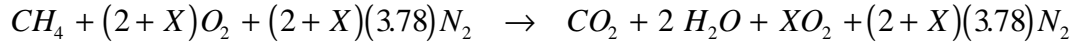
## **ATTACHMENT D**

### **O<sub>2</sub>/CO<sub>2</sub> EXHAUST CONCENTRATIONS**

## O<sub>2</sub>/CO<sub>2</sub> EXHAUST CONCENTRATIONS

### NATURAL GAS

Maximum PM emissions will occur at 0% O<sub>2</sub> in the exhaust stream and District Rule 4301 requires a 12% CO<sub>2</sub> correction. For natural gas firing units, 0% O<sub>2</sub> occurs at 12% CO<sub>2</sub>. This is demonstrated by the following combustion equation for natural gas (wherein X denotes moles of excess air and (neglecting sulfur).



Solving an expression for the fraction of O<sub>2</sub> in the exhaust by volume, wherein the numerator represents the number of moles of CO<sub>2</sub> and the denominator represents the total number of moles of dry exhaust, set equal to 12% CO<sub>2</sub> yields the number of moles of excess air (X).

$$\frac{1}{1 + X + (2 + X)3.78} = 0.12 \Rightarrow X = 0.05$$

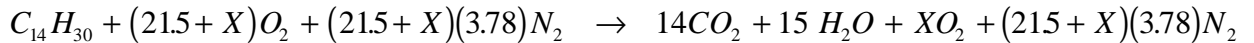
Substituting the coefficients and solving the resultant equation for the fraction of O<sub>2</sub> verifies that 12% CO<sub>2</sub> is equivalent 0% O<sub>2</sub>:



$$\frac{0.05}{1 + 0.05 + 7.75} = 0.0057 \approx 0\%$$

### FUEL OIL

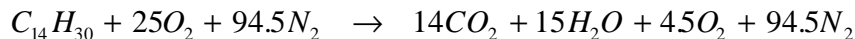
For units burning fuel oil the following combustion equation, wherein X denotes moles of excess air, reveals that 12% CO<sub>2</sub> in the exhaust stream occurs at 4% O<sub>2</sub>. Consequently, the compliance of units firing on fuel oil is shown using AP42 F factors uncorrected from 0% O<sub>2</sub> to illustrate the worst case scenario.



Solving an expression for the fraction of O<sub>2</sub> in the exhaust by volume, wherein the numerator represents the number of moles of CO<sub>2</sub> and the denominator represents the total number of moles of dry exhaust, set equal to 12% CO<sub>2</sub> yields the number of moles of excess air (X).

$$\frac{14}{14 + X + (21.5 + X)3.78} = 0.12 \Rightarrow X = 4.5$$

Substituting the coefficients and solving the resultant equation for the fraction of O<sub>2</sub> in the exhaust verifies that 12% CO<sub>2</sub> is equivalent 4% O<sub>2</sub>:



$$\frac{4.5}{14 + 4.5 + 94.5} = 0.039 \approx 4\%$$

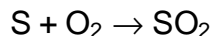


## **ATTACHMENT E**

### **SULFUR/SULFUR DIOXIDE CONVERSION**

## SULFUR/SULFUR DIOXIDE CONVERSION

The following analysis shows the reasoning behind the mass increase in converting sulfur to sulfur dioxide (SO<sub>2</sub>). The chemical equation for converting sulfur into sulfur dioxide is:



The preceding equation shows that 1 mole of sulfur combined with 1 mole of oxygen will create 1 mole of sulfur dioxide. The molecular weight of sulfur (S) is 32.06 grams/mole. The molecular weight of oxygen (O<sub>2</sub>) is 32.0 grams/mole. Thus, when the mole of sulfur is combined with the mole of oxygen, the resulting mole of sulfur dioxide has a mass of 64.06 grams/mole.

The preceding analysis shows that when sulfur is calculated as sulfur dioxide, the resulting mass of sulfur dioxide is twice the mass of initial sulfur converted

## **ATTACHMENT F**

### **Public Comments/District Response**

# Public Comments/District Response

## 1. EPA

Public comments regarding the District's analysis and preliminary decision were submitted by EPA. A copy of the 9/17/2001 EPA letter containing these comments are available at the District.

### **EPA COMMENT**

Prevention of Significant Deterioration Permits: We are pleased that EPA and the District have agreed during our discussions earlier today and last week that the proposed Title V permit will be revised to include requirements from EPA-issued PSD permits. In addition to providing you with a current list of the PSD permits issued to Texaco sources (and predecessors) in the District, EPA will provide you with additional assistance if needed

### **DISTRICT RESPONSE**

Title V permits have been revised to include EPA-issued PSD permits.

### **EPA COMMENT**

MACT standard applicability: We are pleased that EPA and the District have agreed during our discussions earlier today and last week that the proposed Title V permit evaluation will be revised to include a review of EPA MACT requirements to verify that no MACT requirements apply to the source.

### **DISTRICT RESPONSE**

MACT standard exemption is added to the engineering evaluation as Section IX.B.20.

### **EPA COMMENT**

Kern County Rule 424 sulfur compounds limits: Based on our discussions, it appears that most BSG-s are subject to Kern County Rule 424 sulfur compound limits on a unit-by-unit, rather than a facility average, basis. We are pleased that EPA and the District have agreed during our discussions earlier today and last week that the proposed Title V permits will be revised to specify which units= sulfur compound limits can be averaged under Rule 424 and which cannot (based on whether they were initially permitted before 1979).

### **DISTRICT RESPONSE**

Title V permits have been revised to specify which units can be averaged under Rule 424 and which cannot.

## **EPA COMMENT**

We also recommend more frequent fuel sulfur monitoring for units that can burn sour gas, rather than PUC quality low-sulfur gas, to assure compliance with this limit (and NSR limits). The SO<sub>x</sub> emissions from these units are potentially higher and closer to regulatory limits than for sources that burn low-sulfur gas. We recommend at a minimum quarterly monitoring frequency for BSGs burning sour gas, and more frequent monitoring if necessary to assure compliance with NSR limits (the use of continuous monitors, as Occidental source S-2234 uses, at common fuel gas headers is another option). Finally, we recommend clarifying that the rule 424 limits are for Asulfur compound emissions<sup>o</sup>, as specified in the underlying rule.

## **DISTRICT RESPONSE**

The permit is consistent with EPA-approved template requirements.

## **EPA COMMENT**

Monitoring requirements: EPA concurs with the requirement for testing and monitoring of NO<sub>x</sub> and CO limits. We suggest specifying the use of AProtocol 1" calibration gas for the portable analyzer. We also have agreed with the District that the language regarding an Aappropriate factor<sup>o</sup> will be removed from the source testing requirements for these permits, as it has been for other sources.

## **DISTRICT RESPONSE**

Federal test method stipulates quality of calibration gas. Therefore specifying the use of "Protocol 1" calibration gas is not needed. The language "appropriate factor" has been removed from source testing requirements.

## **EPA COMMENT**

Specific Limiting Conditions: Some units have Specific Limiting Conditions setting a daily emission rate for a group of units. We recommend clarifying which units are subject to this emission rate, and how compliance with this limit will be enforced as a practical matter.

## **DISTRICT RESPONSE**

Permit conditions have been reviewed to clarify the units subject to the emission rates and how compliance will be enforced.

## **EPA COMMENT**

Loading Rack: We are pleased that EPA and the District have agreed during our discussions earlier today and last week that the proposed Title V permit will be revised to require appropriate monitoring of the loading rack when in use to ensure proper operation and meet the VOC permit limit. The District will add a condition requiring repairs whenever leaks or malfunctions of the loading rack vapor return system are

detected by sight, sound, or visual observation, or will add a similar requirement. We also recommend conditions to ensure that the liquids loaded through the loading racks have a vapor pressure of less than 1.5 psia.

## **DISTRICT RESPONSE**

The following language has been added as a permit condition: Loading rack vapor return system shall be monitored for evidence of leaks by visual, audible, and olfactory methods when in use. When a leak is detected, it shall be repaired as soon as practicable, but no later than 15 calendar days after the leak is detected. Permit condition is in place ensuring that only heavy crude oil with true vapor pressure less than 1.5 psia is loaded through the loading rack.

## **EPA COMMENT**

NSPS applicability: We are pleased that the District has agreed to add a requirement preventing the source that could triggering the NSPS (for instance, by storing oil after lease-custody transfer). This justification is necessary to finalize the District's proposed NSPS shield. We believe that the District's revisions to the permit shield language in Rule 2520 section 13.2.3 will help guide the use of permit shields that are consistent with both District and EPA regulations in the future.

## **DISTRICT RESPONSE**

The District will be addressing the revisions to the permit shield language in future Title V evaluations, but not on this "in-process" Title V source.

## **EPA COMMENT**

Tank #388 and 389 requirements: We are pleased that EPA and the District have agreed during our discussions earlier today and last week that the proposed Title V permit will be revised to add Rule 4623 requirements, and sample at a minimum once per year (in cases where the NSPS does not require more frequent sampling). This is consistent with the requirements for other storage tanks subject to Rule 4623. We also recommend deleting language that could apply to tanks equal to or less than 39,890 gallons, but would not apply to these 840,000 gallon tanks.

## **DISTRICT RESPONSE**

Title V monitoring, reporting, and recordkeeping (MRR) requirements have been added as permit conditions.

## **EPA COMMENT**

Well vents, daily emission rates and control efficiency: We are pleased that EPA and the District have agreed during our discussions earlier today and last week that the proposed Title V permit will be revised to allow alternatives to District Rule 4401 emission factors when only approved by the District and EPA (as well as CARB) as specified in Rule 4401 section 6. In addition, we believe that any emission factors that

are based on a particular leak detection and repair program (LDAR) must be accompanied by LDAR conditions that are at least as stringent.

## **DISTRICT RESPONSE**

All fugitive emission factors are either directly from EPA's document, or are from the CAPCOA document, which adjusts EPA factors. These factors are recognized for use in California by EPA.

## **EPA COMMENT**

Well vents, vapor Collection and Control System: We also suggest clarifying the number of allowable leaks under District Rule 4401 section 5.0, rather than referencing District rule 4401, and specifying that leak checks must include equipment other than the well heads (for instance, see the equipment described in unit 331 condition 12). We also suggest checking for any Rule 4623 requirements or other permit conditions that could be applicable to other processing equipment, such as tanks, compressors, etc.

## **DISTRICT RESPONSE**

Whenever possible we will specify the number of allowable leaks. We will also check for additional Rule 4623 requirements.

## **2. TEXACO COMMENTS**

Public comments regarding the District's analysis and preliminary decision were submitted by Texaco. A copy of the 8/30/2001 Texaco letter containing these comments are available at the District.

## **PUBLIC COMMENT**

Eight steam generators have a condition that requires "Steam generator firebox convection section, scrubber bypass valve, and all flue gas ductwork shall have no detectable leaks." We are not aware of any reference I&M procedures that pertain to SO2 leaks or of a definition of "detectable" in reference to SO2 leaks. Accordingly, we ask that the word "detectable" be changed to "visible." The following permits and conditions would require change: S-1141-44 c27, 45 c27, 46 c29, 52 c29, 53 c27, 55 c27, 60 c27, 61 c29.

## **DISTRICT RESPONSE**

Permit conditions will not be changed. Heat waves, audible, and olfactory methods are all used to detect leaks by District inspectors.

## **PUBLIC COMMENT**

Eleven steam generators have a condition that requires an annual PM-10 source test "prior to the permit anniversary." We ask that the "prior to the permit anniversary" language be removed as District policy now requires annual source testing within 30 days of a prescribed date for each applicable unit. The following permits and conditions would require change: S-1141-368 c20, 369 c19, 370 c19, 371 c20, 372 c19, 373 c20, 374 c20, 376 c20, 377 c20, 378 c20, 380 c20.

## **DISTRICT RESPONSE**

The permit condition is revised to remove "prior to the permit anniversary."

## **PUBLIC COMMENT**

A number of steam generators have a condition that requires the FGR system to be in the open position when the steam generator is operating. A number of our steam generators have FGR systems that are based on O2 control and require a start-up period before the FGR valve opens. Accordingly, we ask that this condition be changed to require: "Flue gas recirculation system shall be in an open position during normal steam generator operation." The following permits and conditions would require change: S-1141-43 c29, 44 c40, 45 c40, 46 c42, 53 c40, 55 c40, 60 c40, 372 c18.

## **DISTRICT RESPONSE**

The condition has been revised to allow acceptable range of positions of the FGR control valve.

## **PUBLIC COMMENT**

Eight steam generators have a condition that requires the SO2 scrubber sprays and/or nozzles to be maintained in "optimum" working condition. We have no specifications for "Optimum" other than operating in compliance with SO2 emission limits. Accordingly, we ask that this condition be changed to: "Scrubber sprays and/or nozzles shall be maintained as required to achieve compliance with emission limits." The following permits and conditions would require change: S-1141-44 c23, 46 c23, 46 c25, 52 c25, 53 c23, 55 c23, 60 c23, 61 c25.

## **DISTRICT RESPONSE**

The conditions are revised as requested.

## **PUBLIC COMMENT**

The following steam generator ATCs were recently implemented by Texaco and should be included as part of the Title V permit. S-1141-392-5, 394-5, 396-5, 402-7, 516-2, 517-2, 529-2, 559-0.

## **DISTRICT RESPONSE**

The ATCs, except for S-1141-392-5, -529-2, and -559-0, have been converted to PTOs and included as part of the Title V permit.



## **PUBLIC COMMENT**

Transfer of location S-1141-373-8, 38-18, & 372-7 were recently implemented by Texaco and should be included as part of the Title V permit. The corresponding Draft Title V permits for these steam generators are correct and maybe used with the new location (Sec 21, T32S/R23E) noted and the below noted corrections to S-1141-38-11. S-1141-38-11; remove the word scrubbed from the equipment description; add the new location to condition 17; delete condition 20 as it pertains only to scrubbed units.

## **DISTRICT RESPONSE**

ATCs S-1141-373-8, -38-18, and -372-7 have not been converted to PTOs and are not included as part of the Title V permit. Permit S-1141-38-11 is revised to remove the word scrubbed and the new location added.

## **PUBLIC COMMENT**

A number of heater treaters have a condition that requires the excess combustion air inlet damper to be maintained such that the hinge operates freely. We are not aware of the origin of this condition as it does not seem to apply to any of our equipment configurations. Accordingly, we ask that this condition be dropped. The following permits and conditions would require change: S-1141-73 c15, 233 c17, 235 c15, 236 c17, 238 c17, 239 c17, 259 c15.

## **DISTRICT RESPONSE**

The condition is retained. The facility needs to submit an Authority to Construct to re-evaluate the condition.

## **PUBLIC COMMENT**

Reference to permit 420 on S-1141-417 Condition 20 should be deleted. The tank represented by S-1141-420 is not served by the tank vapor recovery system described on S-1141-417-1. Review of Permit S-1141-420 will confirm this.

## **DISTRICT RESPONSE**

The condition is deleted.

## **PUBLIC COMMENT**

Reference to TEOR system S-1141-411 in condition 21 should be changed to S-1141-250 as discussed below.

## **DISTRICT RESPONSE**

Condition is revised to reference S-1141-250.

## **PUBLIC COMMENT**

The location on Permit S-1141-115 should be corrected to SE16. This error has probably existed for a number of years.

## **DISTRICT RESPONSE**

The location is corrected to SE16.

## **PUBLIC COMMENT**

The following tank vapor recovery ATCs were recently implemented by Texaco and should be included in the Title V permit. S-1141-88-3, 89-3, 90-3, 91-3, 105-3, 106-3, 473-2, 474-2, 475-0, 476-0, 477-0, 478-0.

## **DISTRICT RESPONSE**

ATCs S-1141-88-3, 89-3, 90-3, 91-3 had been converted to PTOs and included in the Title V permit.

## **PUBLIC COMMENT**

S-1141-127-3 replaces previous versions of S-1141-127. Conditions 18 & 22 on Draft S-1141-127-1 are revised.

## **DISTRICT RESPONSE**

Revised conditions are included in the Title V permit.

## **PUBLIC COMMENT**

ATC S-1141-250-13 was recently implemented. This permit consolidates the TEOR Operations described on permits S-1141-250, 251, 317, 331, 365, 367, 381, 382, 409, 410, 411, & 428 into one permit (S-1141-250). Upon implementation of S-1141-250-13, permits S-1141-252, 317, 331, 365, 367, 381, 382, 409, 410, 411, & 428 may be cancelled. Please note that S-250-13 also incorporates operations described on S-1549-113. We will apply for a minor modification of the S-1549 Title V permit to incorporate these changes.

## **DISTRICT RESPONSE**

ATC S-1141-250-13 has not been converted to a Permit to Operate and not included in the Title V permit.

## **PUBLIC COMMENT**

ATCs S-1141-253-13, 263-11, 320-8, 366-6, & 430-4 were recently implemented. The conditions on these permits should be incorporated onto their respective Title V permits.

## **DISTRICT RESPONSE**

These ATCs have not been converted to Permit to Operate and are not included in the Title V permit.

### **PUBLIC COMMENT**

Flare permits S-1141-513 & 514 were implemented.

### **DISTRICT RESPONSE**

Permit S-1141-514 has not been converted to a Permit to Operate and is not included in the Title V permit. Permit S-1141-513 had been converted to a Permit to Operate and included in the Title V permit.

### **PUBLIC COMMENT**

The following permits have been cancelled either by a letter from Texaco to the District or by implementation of ATCs. S-1141-76, 77, 78, 87, 92, 93, 94, 95, 96, 97, 98, 99, 100, 101, 102, 103, 104, 122, 123, 125, 133, 175, 176, 178, 196, 197, 207, 425, 454, 455, 456, & 457. Cancelled by August 30, 2001 letter.

### **DISTRICT RESPONSE**

Permits are cancelled.

## Title V Facility Contacts

Created On (Date):

December 7, 2001

For (Facility name):

Texaco California Inc.

(DBA ID Number):

S-1141

By (District Staff Person):

Juscelino Siongco

Based on Information Provided by:

Roy Campbell

### Responsible Official

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